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1 the clerks, did you also go over the new employees,
2 the post office's initial expectations?

3 A. Instructions and all, yes.

4 Q. And I guess you completed something called a
5 1750 on each of those employees or you started one?

6 A. I started one. I didn't complete them
7 because they're not completed until their
8 probation's over.

9 Q. Okay. And incidentally, where with respect
10 to the letter carriers -- strike that.

11 Did you have your own office at the
12 Phoenixville Post Office when you were clerk
13 supervisor?

14 A. I had an office upstairs. And I worked a
15 lot out of those carriers supervisors office.

16 Q. So you had --

17 A. Basically I had an office upstairs because
18 of finances and all.

19 Q. My understanding was there were actual
20 offices for the management upstairs, but the
21 supervisors also had areas they predominantly
22 occupied downstairs on the floor?

23 And I guess what I'm trying to find out is
24 did you actually have a desk in the clerical area of

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1 the post office?

2 A. Up in my office.

3 Q. Up in your office, okay. Was there one area
4 you generally stayed from 3:00 a.m. to 2:30?

5 A. Yes.

6 Q. Where was that?

7 A. That would be on the floor.

8 Q. Okay.

9 A. In other words, you can't just -- you don't
10 sit in your office. You got to be hands on.

11 Q. Okay. And where was the clerical area in
12 comparison with the letter carriers casing area?

13 A. Piece of paper?

14 Q. Sure. Just a second.

15 A. I think, you know, if you see the diagram,
16 then you'll understand

17 Q. Oh, if you would diagram it, it would be
18 magnificent. I'd appreciate that.

19 A. I guess this is pretty much what you want to
20 know.

21 Q. Okay. Before we go any further, let's mark
22 this Bonner-3.

23 - - -

24 (Whereupon, Exhibit Bonner-3 was marked

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1 for identification.)

2 - - -

3 BY MR. GOLDNER:

4 Q. Okay. Now, your diagram we've marked
5 Bonner-3. Could you explain to me what you drew?

6 A. Okay. Over here in this corner here are the
7 carriers cases.

8 Q. I'm going to interput you, not to be rude,
9 so that the record is really clear what you're
10 talking about.

11 You just indicated a sort of a horseshoe
12 type area on the top of the page that says carriers
13 cases and has numbers running in a clockwise
14 fashion.

15 A. One through 25, right.

16 Q. Okay. Very good. Go ahead, I'm sorry.

17 A. Here you have a supervisor's desk, that's a
18 carriers desk supervisor.

19 Q. And you wrote carrier supervisor desk. So
20 that would have been where Mr. Sands, that would
21 have been sort of his base of operation?

22 A. For the stuff he needs for the morning like
23 the 3996's.

24 Q. Okay. And you have little bins in the

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1 middle.

2 A. These are hampers.

3 Q. Okay.

4 A. This is where we throw the parcels.

5 Q. Okay. Very good. Go ahead.

6 A. Over here is a letter case and a letter case
7 for clerks.

8 Q. Okay.

9 A. These are the letters in here. And there's
10 a flat case behind that that you throw the flats in.
11 So when the clerks are working I'm right here.

12 Q. Okay. You're indicating supervisor --

13 A. Clerk supervisor.

14 Q. Okay.

15 A. It's not even a desk, it's more like a
16 little table. I do all my work from here until all
17 the mail is up, and then I leave that area.

18 Q. Okay. All right.

19 A. But normally until 3:30 to 4:30 I can be
20 floating around anywhere doing different paperwork.

21 Q. Okay.

22 A. So then like I said from 5:00 to whenever
23 this mail is up, eight, 8:30, I would be right in
24 this general area.

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1 Q. That's a.m.?

2 A. Yes.

3 Q. Now, did you ever get involved in the actual
4 casing of mail?

5 A. Clerk's mail?

6 Q. No. No. The letter carrier's mail, did you
7 ever get involved in casing with the letter
8 carriers?

9 A. Here?

10 Q. Yes, sir.

11 A. I couldn't do it.

12 Q. You couldn't do it?

13 A. No.

14 Q. Okay. Why not?

15 A. Because I'm a supervisor.

16 Q. Okay. You weren't allowed to?

17 A. Right.

18 Q. Why was it you weren't allowed to?

19 A. Because it's craft work.

20 Q. Okay. Is that a work rule --

21 A. Yes.

22 Q. -- in connect with the --

23 A. Yes, it's in the contract.

24 Q. Okay. That's all I was trying to get at.

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1 Very good.

2 Were the clerks in the same local as the
3 letter carriers?

4 A. No.

5 Q. Oh, okay.

6 MS. UYGUR: It's a different trade.
7 They're not even really related.

8 THE WITNESS: Right. It's like
9 electricians and carpenters.

10 MS. UYGUR: Or plumbers. They're
11 totally different. They're in the same
12 building. But one doesn't have anything to
13 do with the other. They just occupy the
14 same space.

15 MR. GOLDNER: Off the record.

16 - - -

17 (Whereupon, a brief discussion was
18 held off the record.)

19 - - -

20 BY MR. GOLDNER:

21 Q. Okay. All right. Just to go back to the
22 last thing. Even though it was two different trades
23 that didn't prevent you as management from starting
24 the 1750's for letter carriers; is that right?

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1 A. Correct. I mean that's a management
2 function.

3 Q. Okay. Fair enough. Now, did you -- where
4 did you -- actually strike that.

5 Explain to me how you did it, how you
6 started your 1750, what was the procedure?

7 A. Well, in other words, the 1750's would come
8 in, and then we set up a time for the new employee
9 to come in.

10 Q. Okay.

11 A. And then we take them up to a conference
12 room.

13 Q. Okay.

14 A. I'd sit down there. And I think it had six
15 items on it or something like that. I don't
16 remember now. Seven items on the 1750.

17 I would go over each one, then I would
18 transcribe a little more information on to a yellow
19 sheet of paper.

20 Q. Okay.

21 A. Line paper and explain it again, and then I
22 would have the employee initial that he understood.
23 Then at the end of the converstaion I would ask him
24 if he had any questions or anything.

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1 Q. This procedure of going over the 1750, and
2 then transcribing it and getting the employee to
3 sign, was that your own procedure or had you been
4 taught that? Or how did that procedure come about?

5 A. I just thought to me it was better, I mean
6 as opposed to just doing the 1750. It was so vague.

7 Q. Okay.

8 A. I wanted to do a little more -- get a little
9 more information to the individual.

10 Q. All right. How long had you been doing
11 1750's with new employees in '96, for how many
12 years?

13 A. Eight.

14 Q. Okay.

15 A. Roughly I mean.

16 Q. Fair enough.

17 A. You don't get that many new employees over a
18 course of time anyway.

19 Q. Okay.

20 MR. GOLDNER: Let's mark this
21 Bonner-4.

22 - - -

23 (Whereupon, Exhibit Bonner-4 was marked
24 for identification.)

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1 initial 1750's?

2 A. I'm sure he has.

3 Q. Okay. Do you have any particular
4 recollection as to why you might have done letter
5 carrier -- strike that.

6 Okay. Then I take it if they weren't your
7 employee, meaning they weren't a clerk, you would
8 never see the 1750 again once you started it?

9 A. Correct. Because I wouldn't be evaluating
10 them.

11 Q. Okay.

12 MR. GOLDNER: Off the record.

13 - - -

14 (Whereupon, a brief discussion was held
15 off the record.)

16 - - -

17 THE WITNESS: Excuse me. There were
18 a lot more hampers here.

19 BY MR. GOLDNER:

20 Q. Oh, you didn't need to do a one to one --

21 A. Right. I just wanted you to be aware of
22 that.

23 Q. I appreciate that. Okay. Do you know what
24 clock rings are?

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1 A. Sure.

2 Q. Could you explain to me what the clock rings
3 are?

4 A. It's when a carrier starts day or a clerk,
5 and then when they end the day if it's a clerk, when
6 they hit out for lunch and when they hit in for
7 lunch.

8 Q. Okay. Where is the clock located?

9 A. Right here.

10 Q. And we're looking at Bonner-3 right by the
11 clerk supervisor's desk?

12 A. Yes. See, wait a minute. See?

13 Q. Oh, where it says clock. You already had
14 clock?

15 A. Yeah.

16 Q. Where it says clock?

17 A. See where the double doors are, you come in,
18 there's a door right here and the clock's right
19 there.

20 Q. And everyone uses the same clock --

21 A. Sure.

22 Q. -- no matter what trade they are; is that
23 right?

24 A. Right. They're just different codes.

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1 Q. All right. And do you swipe something or do
2 you just --

3 A. No. No. Your badge.

4 Q. All right.

5 A. Everybody has a plastic badge.

6 Q. If an employee makes a mistake in what they
7 key in, is there a way it can be corrected?

8 A. I would do that the next morning. I go over
9 the clock rings. Now, if a carrier, say he hit it
10 wrong and he was aware of it at that time and he
11 went to Kenny or to me and said look I did it wrong,
12 then we would turn around and correct it right then.

13 In most cases we catch, you know, any errors
14 in the morning.

15 Q. All right. Did you also correct the clock
16 rings of carriers, letter carriers?

17 A. What do you mean correct?

18 Q. If there was a mistake? Let me come at this
19 another way. You said you reviewed the clock rings
20 every day?

21 A. Every day, right. Well, because I had to do
22 the 3930's on both sides.

23 Q. What are 3930's?

24 A. That's the overall report, the productivity

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1 report for the carriers and the clerks and records
2 the volume and records the hours used and so on.

3 Q. Okay. Now, so would you correct errors in
4 clock rings when letter carriers made incorrect
5 clock rings?

6 A. Okay.

7 Q. Let me ask you. In the morning when you
8 made corrections to clock rings, did those include
9 letter carriers clock rings or did you only correct
10 clerks clock rings?

11 A. I did all corrections.

12 Q. All corrections?

13 A. Right.

14 Q. How would you know a letter carrier's clock
15 rings needed to be corrected?

16 A. Well, in other words, and this is only
17 supposition right now, hypothetical, because let's
18 say you work today, and then you hit on the street,
19 now you're back, you finish your route, you finish
20 inhouse, now you hit end time, you leave.

21 What you failed to do was to hit back in off
22 of the street, so therefore I would turn around and
23 say hey, look he finished at 4:30. So at 4:25 I'd
24 put down that he came off the street.

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1 He could have been off at 4:00. I wouldn't
2 have know that. See, I can't generate hours for you
3 until you have your four rings.

4 Q. Okay. Four rings?

5 A. Right.

6 Q. And the four rings are in --

7 A. Begin time, out to the street, in from the
8 street and end time.

9 Q. Okay. Now, would your corrections also
10 include designating which route a carrier was on?

11 A. Yeah. For auxillary, yes.

12 Q. What do you mean for auxillary?

13 A. In other words, if you came in today and
14 you're on Route 2 and you're going to do an hour on
15 five Route, then I'd have to move an hour over, but
16 I would get that off the schedule.

17 Q. Okay. How would you know in any given
18 morning what corrections needed to be made to the
19 clock rings?

20 A. Well, I'd have to look at the errors.

21 Q. And how would you know there were errors?

22 A. In other words, if you're in error you're
23 going to come up on another report that you're not
24 -- you don't have four basic rings.

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1 Q. So would you generate an error report each
2 morning to find out where there were mistakes on
3 clock rings?

4 A. Sure. Well, it would come up when I pull
5 all the reports.

6 Q. What reports did you pull in the morning?

7 A. All the time reports. I did my bookkeeping
8 for the finance in the morning.

9 Q. Is that for the windows, the retail windows?

10 A. Right.

11 Q. That was also your responsibility?

12 A. Right.

13 Q. Go ahead. I'm sorry.

14 A. Between 4:30 and five, 5:30, I might be off
15 the floor.

16 Q. You would be pulling this information from a
17 computer terminal?

18 A. Correct.

19 Q. And did you have a computer terminal in your
20 upstairs office?

21 A. No. I would pull it from this one right.

22 Q. And you're indicating which office would --

23 A. The supervisor's office.

24 Q. There was a supervisor's office on the main

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1 floor?

2 A. Right. Because that's where all your
3 computers are.

4 Q. Okay.

5 A. It's also the computer room for there.

6 Q. And those are print to a printer located
7 there too?

8 A. Correct.

9 Q. How many pages or report would you have to
10 generate every morning?

11 A. Believe it or not it varied. If there were
12 no errors, there was only a couple pages. And if it
13 was -- it would still only be a couple pages, but
14 there would be a page here for the reports.

15 Q. Okay. Now, when you get the error reports,
16 did you always know what the corrections were to be
17 required to be made in the clock rings?

18 A. No.

19 Q. How would you find out if you didn't know --

20 A. In other words, I had to go to the carrier's
21 schedule and I'd have to go to the 3996's to see
22 where the carrier was.

23 Q. Okay.

24 A. So in other words, I had to track other

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1 paperwork.

2 Q. Did you ever ask a carrier what route were
3 you on yesterday you forgot to ring on to your
4 route?

5 A. Well, I've had carriers not hit on the
6 right, yeah.

7 Q. Would you just say to a carrier, you know,
8 what route were you on I got to make a clock ring
9 fix?

10 A. I know I've done that. But I can't recall
11 any particular incident.

12 Q. Okay. Was there any special adjustment
13 needed if two carriers were on one route?

14 A. I'm sorry?

15 Q. Did you ever have two carriers on one route?

16 A. Sure.

17 Q. Did the system allow two carriers to be on
18 one route?

19 A. Sure.

20 Q. It wouldn't be an error report, for example,
21 if two carriers rang in on the same route?

22 A. No.

23 Q. Okay.

24 A. They'd just be charged that much more time

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1 for that route.

2 Q. They --

3 A. The machine would charge. In other words,
4 if you and your guy next to you both hit on the same
5 route, then all the time that day would be charged
6 to that route instead of the route next to you.

7 Q. All right. Okay. When you went over work
8 quantity with these employees and their 1750 --

9 A. Correct.

10 Q. -- was there any sort of guideline or key
11 numbers that you told them they needed to hit in
12 terms of work quantity?

13 A. This looks like a clerk sheet for some
14 reason.

15 Q. Okay. And you're indicating Bonner-4, page
16 two.

17 A. Yeah. The reason I'm saying that that looks
18 more like a clerk because it's talking about errors.

19 Q. Okay.

20 A. See, on a carrier, I would probably -- I
21 don't know if I would have wrote it down but I would
22 have told them that there's a minimum standard of 18
23 and eight.

24 Q. Tell me about that, what's that 18 and

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1 manual in Teleford. We didn't have the clock
2 per se, we had cards.

3 Q. Okay. Were there any other standards
4 besides casing and delivering the route within eight
5 hours and the 18 and eight standard? **Were there any**
6 **other standards that were expected for letter**
7 **carriers to meet within their probationary period?**

8 A. **Regular attendance.**

9 Q. Were they supposed to be able to do more
10 than one route, case and deliver more than one
11 route?

12 A. They were never judged on one route. They
13 were never -- in other words, it was just your
14 proficiency.

15 Q. Okay. Were there some routes that were
16 harder than others? At Phoenixville in February and
17 March of '96, were there some routes that were more
18 difficult than others?

19 A. If I had to take a shot, I'd probably say 13
20 and either 22 or 24. I don't know which one -- Gene
21 was on the heavy route. They were just heavy
22 volume.

23 Q. Volume? Okay.

24 A. I mean that we started to make other

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1 Q. What does the program measure?

2 A. Volume of mail, time casing.

3 Q. Okay. Who inputs the data into the computer
4 so that it can make that calculation?

5 A. The clock rings were automatically
6 downloaded I believe. And the volume was entered
7 manually by one of the managers.

8 Q. Is that a raw count of number of pieces of
9 mail or what kind of measurement is that?

10 A. The measurements that we inputted was
11 footage. And the computer would break it down.
12 They had a standard of so many pieces per foot or
13 two feet or whatever it was.

14 Q. Okay. All right. And how do you measure
15 the footage?

16 A. It would be in a tray and we would compress
17 it and look at it, and then it would be on the
18 ledge.

19 Q. Okay. Did somebody actually take a ruler to
20 it and measure the footage?

21 A. There were rulers, I believe on the top of
22 the carrier cases. And for the flats, they were on
23 the legs of the cases.

24 Q. Okay. So you could basically look at a tub

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1 and tell how many feet of mail was contained; is
2 that correct?

3 A. Approximately, yes.

4 Q. All right. I guess what I'm trying to
5 establish is in terms of monitoring through put of
6 casing --

7 A. I'm sorry. I don't understand the words
8 through put.

9 Q. I'm sorry. I'm using the computer term.
10 But in terms of measuring the volume of mail cased,
11 that could be done without somebody actually sitting
12 there and watching somebody case and counting the
13 number of pieces they case?

14 A. That's correct.

15 Q. All right. Okay. Now, how many, if you
16 recall, how many routes did the Phoenixville Post
17 Office have in late winter, early spring of '96?

18 A. I don't remember the exact number.

19 Q. Were they all about the same the different
20 routes?

21 A. What do you mean the same?

22 Q. Well --

23 A. They all had different streets. They all
24 have different modes of delivery.

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1 Q. Okay. How about in terms of length or the
2 nature of the delivery itself, whether you're going
3 to apartment buildings, office buildings, rural
4 routes and so forth?

5 A. Rural routes were different than the letter
6 carriers. That's a separate entity. And the other
7 routes -- all the routes were different.

8 We had some that were walking. Some were
9 walking and dismounted. Some were just all riding
10 routes. The length of time, whatever the inspection
11 was prior to that, they were all supposed to be
12 adjusted at eight hours.

13 Q. And eight hours means cased and sorted
14 within eight hours?

15 A. Sorted, delivered, returned, off the street,
16 go home.

17 Q. All right. And in terms of that, was there
18 a time frame in which it was expected that each
19 route would be cased and delivered?

20 A. Yes. There was street times and office
21 times.

22 Q. All right. Was there, I mean was there a
23 general time frame? Was there a time by which
24 everybody was anticipated to be off the street and

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1 back?

2 A. Yes.

3 Q. What time was that?

4 A. We had staggered starting times.

5 Q. Okay.

6 A. That way we wouldn't have congestion at the
7 time clock. And it depended on their office time
8 also. How long their office time, they may have
9 started earlier. Or if they were a business route,
10 they may have started earlier to get them on the
11 street.

12 Q. Okay. So there were different start times
13 and different --

14 A. End times.

15 Q. -- end times? Got you. Very good. All
16 right.

17 While you were at Phoenixville Post Office,
18 did you ever case Route 11?

19 A. No.

20 Q. Did you ever case at all?

21 A. I wasn't allowed to. I was a manager.

22 Q. That's what I figured. But I take it that's
23 a no then?

24 A. That's no.

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1 Q. You were allowed to train on casing but not
2 actually do the casing?

3 A. Actually at the time Mr. Hoffman was
4 employed, I believe we had training employees.

5 Q. Do you remember who they were?

6 A. No, I do not.

7 Q. Okay. All right. Were there labels
8 available for the cases to assist the carriers in
9 casing their mail?

10 A. The labels were on the case, yes.

11 Q. Okay. Was there anything in particular
12 about labels that would vary from route to route
13 other than, obviously, addresses, streets and so
14 forth?

15 A. I don't understand the question.

16 Q. Were some routes labels not as good as other
17 routes labels?

18 A. It's possible.

19 Q. And how would that happen?

20 A. Just wear and tear. Possibly changing the
21 delivery of the route. If the carrier's labels were
22 worn, they would request new labels and you would
23 give them to them.

24 Q. The labels on the cases, did they have the

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1 names of the people living at the --

2 A. No.

3 Q. Just addresses and street names?

4 A. Unless the carrier wrote them on there for
5 apartments sometimes.

6 Q. Okay. And how would a brand new letter
7 carrier know that they could request new labels?

8 A. I'm not sure.

9 Q. Okay. Do you know what route Mr. Cassano
10 used to work?

11 A. I think he was on 11 Route.

12 Q. And is there anything you remember about
13 Route 11 in particular?

14 A. It was a walkout route with relays.

15 Q. What does that mean, walkout with relays?

16 A. That means you don't have a vehicle and your
17 mail is dropped off in what used to be the green
18 relay boxes. You would go from point A to point B
19 to point C.

20 Q. Okay. All right. Now, with respect to
21 probationary employees again, there were supposed to
22 be evaluations of these employees during their
23 90-day probationary period; is that right?

24 A. I believe so, yes.

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1 Q. And if I understand from things that other
2 people have testified to in this case, that was
3 roughly 30 days, 60 days, and then 80 days?

4 A. I don't remember the last number.

5 Q. Okay.

6 A. But I remember 30, 60, 90.

7 Q. All right. And was it your job as the
8 delivery supervisor to do the 30 and 60-day
9 evaluations for probationary carrier?

10 A. If that employee was given to me to do, yes.

11 Q. Well, in particular, do you remember doing
12 Kenneth Hoffman's 30 and 60-day evaluation?

13 A. I do not remember, no.

14 Q. Okay. Now, I'm going to show you what we
15 marked at Mr. Shoch's deposition as Shoch-7. It's a
16 very poor copy. I apologize. Take your time.

17 A. Okay. What's the question?

18 Q. Have you seen that form before?

19 A. Yes.

20 Q. Is your signature on that form?

21 A. My initials are.

22 Q. Well, direct your attention to Box 11.

23 A. Oh.

24 Q. Is that your signature too?

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1 A. Yes.

2 Q. With respect to Boxes 7B, 8B and 9B, did you
3 complete those?

4 A. It looks like my handwriting.

5 Q. Okay. And my understanding, again, from
6 other deposition testimony is that the letters in
7 Box 7B, 8B and 9B running from A through F
8 correspond from the factors that appear below on
9 this form?

10 A. Yes.

11 Q. All right. And, incidentally, this form
12 does say 1750 at the bottom. Is this a form 1750?

13 A. It says it right there, yes.

14 Q. Okay. Now, in your 19 years with the post
15 office, about how many probationary employees would
16 you say you evaluated at 30 and 60-day intervals on
17 a Form 1750?

18 A. I don't remember.

19 Q. More than a hundred?

20 A. No.

21 Q. More than 50?

22 A. Probably not.

23 Q. More than ten?

24 A. Possibly.

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1 Q. Okay. Was there an approach that you used
2 to evaluating probationary employees when you
3 completed their 30-day evaluation? And now I just
4 want you limit my inquiry to 30-day evaluation, the
5 first evaluation.

6 A. I'm sorry. What?

7 Q. Was there a general approach that you used
8 in evaluating probationary employees in their first
9 30 days?

10 A. Well, the approach would be that I would
11 gather the information that was available on what
12 they did. There is no standard of what each person
13 would do within 30 days, 60 days, 90 days.

14 As far as would depend what was available in
15 the office that you were in. There may not be any
16 open routes. They may be put on collections. And
17 you move them around. And you look at their times
18 and see what they're doing. Check attendance.
19 Check reporting times.

20 Q. Okay. Did you used to check clock rings?

21 A. I believe so, yes.

22 Q. Okay. Would you check clock rings routinely
23 as part of the 30-day evaluation?

24 A. To see if they're on schedule, to see how

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1 long they're taking, yes.

2 Q. Okay. And just so we're clear, that would
3 be something you would do as opposed to Mr. Bonner
4 checking clock rings?

5 A. Mr. Bonner would check clock rings also.

6 Q. Would he report to you on how your letter
7 carriers were doing?

8 A. It's a job of every supervisor. If I was
9 the one that was doing the evaluations to know what
10 their opinions were and to know what information
11 they have for me, yes.

12 Q. Would you ask, for instance, would you say
13 to Mr. Bonner, I got to do a 30-day evaluation next
14 week, can you check this guy's clock rings for me?

15 A. If I didn't have time to do it, it's
16 possible I would ask for assistance.

17 Q. Okay. All right. As you sit here today, do
18 you have an independent recollection of who checked
19 the clock rings of Mr. Hoffman before you did the
20 30-day evaluation?

21 A. No.

22 Q. Okay. And just so we're clear what a clock
23 ring is. The computer is there. There's a computer
24 located sort of in the middle of the floor there?

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1 A. It's at the entrance door to the rear of the
2 post office.

3 Q. I'm going to show you what we marked at Mr.
4 Bonner's deposition as Bonner-3. Now, that is
5 certainly not to scale. I think we said that on the
6 record.

7 My question is does that diagram loosely and
8 certainly not to scale approximate the layout in the
9 Phoenixville Post Office?

10 A. In a crude way, yes.

11 Q. Okay. And can you just put it down so I can
12 see? Thank you.

13 Now, it's my understanding he drew a little
14 box that says carrier and it says SUPV desk.

15 Was there a desk in the area loosely
16 indicated in Bonner-3 for the delivery supervisor to
17 have a desk?

18 A. Stand-up desk.

19 Q. And the clock and computer you're referring
20 to, that was in the lower left hand corner, correct,
21 near the clock?

22 A. I'm sorry? The clock computer?

23 Q. Yeah. Where was the computer?

24 A. The computer was in the supervisor's office.

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1 A. I believe so. I believe every effort would
2 have been made to do that.

3 Q. Okay. All right. And you reviewed the
4 clock rings before each and every evaluation you did
5 of Mr. Hoffman; is that right?

6 A. I believe I did, yes.

7 Q. Okay. Well, Mr. Sands, I reviewed all the
8 clock rings and of Mr. Bonsall, Mr. Marcantonio and
9 Mr. Hoffman during their respective equivalent time
10 period, if I told you that the analysis shows
11 Mr. Hoffman was able to case and deliver his mail on
12 time four or five times which is more than either
13 Mr. Marcantonio or Mr. Bonsall, but Mr. Hoffman was
14 the one who wasn't hired, could you suggest to me
15 why that would be?

16 MS. UYGUR: Objection to form.

17 THE WITNESS: You're saying he had
18 the same time?

19 BY MR. GOLDNER:

20 Q. I'm saying he had better time, Mr. Sands.

21 MS. UYGUR: Objection.

22 THE WITNESS: I don't remember. I
23 can only go by what you have shown me.

24 BY MR. GOLDNER:

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1 Q. You would have to rely on the clock rings?

2 MS. UYGUR: Objection to form.

3 BY MR. GOLDNER:

4 Q. Is that right?

5 A. Not necessarily.

6 Q. As you sit here today --

7 A. The other thing is on the schedule on this
8 the clock rings don't show whether or not he had any
9 assistance on the street.

10 Q. But they don't show whether Mr. Bonsall or
11 Mr. Marcantonio had any assistance on the street
12 either, do they?

13 A. No, they don't.

14 MS. UYGUR: Object to the form.

15 BY MR. GOLDNER:

16 Q. So if they showed with assistance
17 Mr. Marcantonio and Mr. Bonsall were late most of
18 the time and Mr. Hoffman was on time most of the
19 time, what conclusions would you draw from that?

20 MS. UYGUR: Objection to form.

21 THE WITNESS: The only conclusion is
22 that at the time the decision was made by
23 the evaluations all information available.

24 Talking to me this many years later,

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1 I don't remember. I really don't.

2 BY MR. GOLDNER:

3 Q. Do you remember who made the decision to
4 terminate Mr. Hoffman; you or Mr. Shoch?

5 A. Any employee that's going to be terminated,
6 the supervisor would talk to other managers and get
7 their input and also talk to the Postmaster.

8 Q. Did you make the recommendation to terminate
9 Mr. Hoffman?

10 A. I do not remember.

11 Q. When you reviewed Sands-1 your letter of
12 July 18, 1996 before testifying today, did that
13 refresh your recollection as to whether you
14 recommended that Mr. Hoffman be terminated?

15 A. The termination would rest with me. It
16 would have been me on all inputs and available
17 information.

18 Q. So it's fair to say that you made the
19 decision to terminate Mr. Hoffman?

20 MS. UYGUR: Objection to form.

21 BY MR. GOLDNER:

22 Q. Is that what you're saying?

23 A. Did I sign the 90 day form, then yeah.

24 Q. I'm sorry?

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1 was, what collections were, what training numbers
2 were and what router numbers were.

3 Q. Okay. Now, just so we're clear on what
4 we're talking about. I'm going to take the page
5 marked KH00994 which is the top document and I'm
6 going to mark that Schoch-1. I'll have the court
7 reporter mark it Schoch-1.

8 - - -

9 (Whereupon, Exhibit Schoch-1 was marked
10 for identification.)

11 - - -

12 BY MR. GOLDNER:

13 Q. And we're going to have this packet of
14 documents collectively be Schoch-1. But with
15 respect to that first page you just mentioned 727
16 and you mentioned some codes.

17 Could you show me where, and I think we'll
18 have you mark with the blue pen.

19 A. The first one's not a good one to use
20 because it's more that should have been on this
21 page. This is just the end result which tells you
22 he had this code on this thing.

23 Q. Let's just back it up. We're going to talk
24 codes.

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1 A. All right. Which is the one here that says
2 operation, OPR, 728.

3 Q. Okay. Those are the codes you've reviewed?

4 A. Yes.

5 Q. Okay. Could you circle that on this and put
6 your initials so we're absolutely sure what we're
7 talking about?

8 A. Uh-huh. (Witness complies.)

9 Q. Okay. Thank you. So if I understand, you
10 reviewed with somebody what those codes meant?

11 A. I looked at the sheet and I called down to
12 my supervisor. I said I'm looking at some numbers
13 here and I want to make sure I got the right ones.
14 Because I knew 728 and 727. But I wasn't sure what
15 731 was, what's 733 and 709.

16 Q. Okay.

17 A. And if you want, I can put them on a piece
18 of paper for you.

19 Q. Well, we're way out of order.

20 A. Okay.

21 Q. 727?

22 A. 727 is street time. That's how long he was
23 on the street. It starts when he went on the
24 street.

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1 Q. Okay.

2 A. 728 is office time. That's work he has done
3 in the office.

4 Q. Okay.

5 A. 709 is also office work, but we call it
6 router. Which is you have a carrier who cases his
7 mail and goes on the street. When they go on the
8 street, there may be people that stay inside, case
9 mail and we call them routers.

10 Q. Okay.

11 A. Okay. 731 is a code for collections. If
12 you go out to empty the little blue boxes. That's
13 what that is.

14 Q. Okay.

15 A. 733 is when they go out and deliver parcel
16 post, parcels or they do relays that they put mail
17 boxes for carriers to pick up who are on walking
18 routes.

19 Q. Those are the green boxes?

20 A. Green boxes and some times they use blue
21 boxes.

22 Q. Okay.

23 A. 782 is a code for training.

24 Q. Okay. And now since we're on the subject.

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1 How are these codes entered?

2 A. When employees come in, they swipe a badge.

3 They have a badge that they actually swipe on to and
4 they put the code in to where they're going to work.

5 Q. So the employees know those codes?

6 A. Right. They're posted at the time clock.

7 Q. Oh, okay. So if somebody comes in to
8 deliver parcel post, they better key in 733?

9 A. Correct.

10 Q. All right.

11 A. Well, first you may see them punch in to 728
12 to come in to the office. That's official start.
13 Most times you will see a 728. Then they'll go to
14 their supervisor if they're not a regular carrier.
15 And the supervisor will say okay, go swipe on this.
16 You're going to do parcel post and we'll tell you to
17 swipe on that.

18 Q. And do you swipe when you come in and when
19 you come out?

20 MS. UYGUR: Could you just circle for
21 me what you just said?

22 MR. GOLDNER: Yes. I'll do that
23 right now.

24 MS. UYGUR: Thanks.

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1 MR. GOLDNER: Read the question back.

2 - - -

3 (Whereupon, the court reporter read
4 back the last question.)

5 - - -

6 THE WITNESS: Yeah. When you enter
7 the building, once you're start time, they
8 get in line, the carriers swipe. That's
9 728. Because most of them case mail first
10 thing in the morning.

11 But if you're not assigned to a
12 route, you know, and you're not carrying
13 like a regular section of a town, you see
14 the manager and he'll tell you if you're
15 going to go out and do collection or you're
16 going to go out and do parcel post and
17 relays.

18 Every time you move from one function
19 to another function, you're supposed to
20 swipe the badge.

21 BY MR. GOLDNER:

22 Q. That's what I was trying to get at. Okay.
23 Great. All right. Now, these entries, Schoch-1, if
24 you know, how are these generated?

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1 A. Each day they take all the -- everybody
2 clocks in. In the morning this is also when they
3 swipe, it generates their pay and it also provides
4 the report that you see and you can get a daily
5 report if you wanted to. Most times you don't print
6 a report.

7 But you can get a daily report of all their
8 clock rings. Now what will happen is it you see
9 multiple clock rings that don't match, the computer
10 will automatically pick it out and say there's
11 errors. You don't actually have to go into the
12 manager on the floor knowing what your people did
13 the day before and make a correction to the clock
14 rings or it won't cross right to get everybody paid
15 right.

16 Q. Okay.

17 A. So that's why sometimes you may see a Social
18 Security number in this box out here, that's usually
19 when the supervisor had to go in because they showed
20 up with an error and they had to go and change one
21 of the codes to something else.

22 Q. And for the record, you were reflecting the
23 lower right hand corner of this box?

24 A. Let me see if I can find one for you.

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1 Document KH00996.

2 Q. Okay.

3 A. Out to the right, you'll see some Social
4 Security numbers here.

5 Q. Yes.

6 A. This is where the computer showed up as an
7 error.

8 Q. Just for the record, [REDACTED] 4 is the
9 Social Security number you're referring to?

10 A. Yes. And there's some up top. I don't know
11 whose they are. But it says deleted. But what
12 happens in the morning, they'll give you a list of
13 all the areas for your whole office and you actually
14 have to go in there and make a correction in order
15 to get all the time cards and everything right.

16 Q. Okay. And just for purposes of identifying
17 and clarifying it. It appears to me that these
18 documents that are Schoch-1 are basically print
19 screens of a character based CRT; is that right?

20 A. I don't know what you mean.

21 MS. UYGUR: Objection to form.

22 BY MR. GOLDNER:

23 Q. Somebody just printed a screen? If you look
24 at the document, and let's stay with KH0996 and if

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1 you look at the document in the upper left hand
2 corner it says please type menu to return to the
3 USPS menu and then there's a C prompt, and then a
4 document identified STC255P1.RPT, below that it says
5 online 270104294.

6 Are these basically screen dumps from a
7 computer?

8 A. Yes.

9 Q. Okay.

10 A. Now this is exactly when they swipe the
11 clock is what is read on the dial on the clock, and
12 then the codes that they put in themselves.

13 Q. Where is the computer from which these were
14 generated?

15 A. That's right at the supervisor's desk in the
16 delivery side.

17 Q. And you say supervisor, are we talking the
18 delivery supervisor, the clerical supervisor --

19 A. They all share on computer for the database.

20 Q. All right. Now, before we come back to
21 these records, we sort of spiralled off of my road
22 map. But basically if I understand it the only
23 thing you've reviewed before today's deposition was
24 the codes for these clock rings; is that right?

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1 A. Yeah. Well, I talked to Nuriye.

2 Q. Well, I don't want to know what you said
3 with your lawyer. But in terms of documents
4 reviewed, it's just the codes we're talking about?

5 A. Yes.

6 Q. Okay. Fair enough. And that was when that
7 you reviewed those documents?

8 A. Yesterday. I found them last week. And
9 like I said there were three different names.

10 Q. Okay. Did you have an opportunity to review
11 your testimony from the prior proceeding in December
12 of 2001?

13 A. I recalled what I had.

14 Q. Did you look at the transcript?

15 MS. UYGUR: He did the same
16 preparation. The transcript and --

17 MR. GOLDNER: And the Affidavit?

18 MS. UYGUR: Yes.

19 MR. GOLDNER: Thank you. So let me
20 mark them up and we'll move right to that.

21 Let's mark this Schoch-2.

22 - - -

23 (Whereupon, Exhibit Schoch-2 was marked
24 for identification.)

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1

- - -

2 MR. GOLDNER: And we'll mark this
3 Schoch-3.

4

- - -

5 (Whereupon, Exhibit Schoch-3 was marked
6 for identification.)

7

- - -

8 BY MR. GOLDNER:

9 Q. Okay. Right now you're reviewed Schoch-2,
10 is that the Affidavit you reviewed before testifying
11 in today's deposition?

12 A. Yes.

13 Q. And you reviewed that yesterday?

14 A. Yes.

15 Q. Okay. And I'm going to show you Schoch-3
16 which is an extract of the testimony from the
17 December 18, 2001 hearing. Did you review your
18 testimony from that hearing as well? That's a
19 condensed transcript of the same transcript.

20 When you looked at it it was probably each
21 one of those was one page and it was in Pica as
22 opposed to proportional --

23 A. Something like that, yeah.

24 Q. Okay. So what you're saying is you never

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1 came back off the street to instruct them what they
2 were supposed to do, get off the street or put
3 somebody else out on the street.

4 Q. Okay. And if I understand it, in the middle
5 of '96 or at least when Mr. Hoffman was at
6 Phoenixville Post Office, the early or clerk
7 supervisor was Joe Bonner?

8 A. Yes.

9 Q. And the delivery supervisor was Ken Sands?

10 A. Correct.

11 Q. And Kevin Cepko was the mid shift
12 supervisor?

13 A. For a little bit. He was a carrier from
14 Pottstown just training to get experience as a 204B
15 supervisor.

16 Q. Excellent. Okay. Do you know who Phil
17 Marcantonio is?

18 A. Yes.

19 Q. Who is he?

20 A. He's a letter carrier at the Phoenixville
21 Post Office.

22 Q. Is he still there?

23 A. Yes, he is.

24 Q. And how about Brian Bonsall?

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1 A. Brian Bonsall worked for me. And he left.

2 I don't know what it was for or whatever. I'm not

3 sure if he left on his own or if something happened.

4 I don't know.

5 Q. You didn't play any part in his departure

6 from the post office I take it based on your

7 response?

8 A. Not that I'm aware of.

9 Q. Do you know when he separated from the post

10 office?

11 A. No, I don't.

12 Q. Okay. Murray Perlstein, do you know who

13 that is?

14 A. Yes, I do.

15 Q. Who is he?

16 A. Murray is a carrier. He's on Route 13 right

17 now. Well, I'm not sure back then. But he was a

18 union steward at the time.

19 Q. All right. Jim Cassano?

20 A. Jim Cassano back then was a carrier on Route

21 11. Now Jim Cassano is a carrier on Route 17.

22 Q. Okay. John Miller?

23 A. John Miller he used to be -- well, I'm not

24 sure back then this issue was. John was a carrier

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1 Q. Okay.

2 A. And that's where you were supposed to use
3 your local trainer. They got away with and now they
4 got rid of it again.

5 Q. All right. Mr. Hoffman was hired as a
6 letter carrier?

7 A. Yes.

8 Q. So it was anticipated that he would be
9 casing how many, at the end of his 90 days, how many
10 routes was he expected to be able to case?

11 A. When I interview the letter carriers, I tell
12 them our goals are that you should be able to case
13 and carry two full routes, but you should be able to
14 carry a third route in the time that's designated
15 for street time.

16 Q. You should be able to case and carry per
17 day?

18 A. No. No. No. No. In your whole 90 days
19 you should be able to go over and work on like one
20 route today, do it in eight hours.

21 And then you should be able to do a second
22 route if you have to work a different day. And you
23 should be able to show that you've come that far
24 that you got better to do that. Okay. And then as

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1 far as just casing, having somebody getting the mail
2 ready and you carrying the street time to make that
3 street time.

4 Q. Okay. But not all on the same day?

5 A. No. No. No. No.

6 Q. All right. And is there a protocol that
7 indicates what training should be done in what order
8 for each letter carrier?

9 A. Well, before we get the carriers at our
10 office when they're hired they go to two types of
11 training.

12 They go one to learn about the post office.
13 And they choose their health benefits and stuff like
14 that. The next week they go to what they call a
15 carrier academy where they have actual carriers that
16 have been selected to teach everyone how to case
17 mail, about accountables and stuff.

18 So before we get them they go through a
19 training academy. Now, at the time we had
20 additional trainers in the office. This was
21 something new. So when they came in instead of just
22 going over to another carrier like they do now, they
23 went to the carrier who the union pointed as being
24 an experienced person to train people.

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1 A. Jim Cassano.

2 Q. Let me just mention the reporter can only
3 take down one person speaking at a time. I will try
4 not to step on your answer. Okay?

5 Jim Cassano was the letter carrier assigned
6 to Route 11?

7 A. Yes. He bid that route.

8 Q. Jim Cassano was doing the casing for that
9 route?

10 A. He was casing and carrying. But I think at
11 the time Jim was injured with a back injury.

12 Q. Okay. So when he was out with a back
13 injury, was he completely out?

14 A. No. We had what we call a rehab where he
15 can work under certain restrictions. He just
16 couldn't carry more than, I don't know if it was
17 five pounds or something. So what he did was he
18 cased the mail in the morning and he would answer
19 phones the rest of the day.

20 Q. And after he cased the mail, who would
21 deliver it?

22 A. Mr. Hoffman delivered it during that time.
23 And we had other carriers that carried it too.

24 Q. Do you know whether Mr. Hoffman had an

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1 street. But normally that would have been back, put
2 all the stuff away and punched off to end his tour.

3 Q. So you're talking about the difference
4 between 15:50 and 15:86?

5 A. Yes.

6 Q. About 15 minutes?

7 A. Yes.

8 Q. And just so we're clear on something, help
9 me with this. As long as the letter carrier is in
10 at 3:30 p.m., does it matter how much of that time
11 was casing and how much of that time was actually on
12 the street?

13 A. Well, when it comes to an overtime period,
14 if you take every carrier has 15 minutes extra that
15 25 X 15 which is going to put you way over your
16 budget.

17 Q. No. I'm sorry. I'm not talking about the
18 3:50 versus the --

19 A. All we expect is the carriers come in at
20 seven and they can get their route cased and carried
21 by 3:30 and they're going home. That's usually --
22 we accept that.

23 Q. All right. That's what I'm getting to. So
24 some carriers, would you agree are going to be

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1 faster at casing and slower on the street and some
2 carriers are going to be faster on the street and
3 slower at casing?

4 A. Yes. I explain them to them when I
5 interview them. I tell them in the first couple
6 days you're going to see people leaving an hour
7 before you. But that's when you have to learn to
8 pick it up.

9 Q. Okay. And in terms of the satisfactory
10 rating, all that is is if they're done and off their
11 tour by 3:30?

12 A. It's based on their time and customer
13 complaints too. I mean you're going to take all
14 that in. I mean if you have people mis delivering
15 mail all over the place, it's a problem.

16 Q. Of course. And most people don't want to
17 get their mail after 4:00, right?

18 A. Yes.

19 Q. April 3rd, again, with KH01018. It appears,
20 would you agree with me, that he never got to
21 complete delivery on Route 11, he was put on
22 parcels?

23 A. Correct.

24 Q. And April 3rd was also his 60-day

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1 evaluation, correct?

2 A. Correct.

3 Q. Would you agree with me that by his 60-day
4 evaluation he had had less than four days to himself
5 to case Route 11 and delivery it himself?

6 A. Well, as we we're going through these
7 sheets, I saw more days that showed him casing.

8 Q. He did? Can you find them for me?

9 MR. GOLDNER: Off the record.

10 - - -

11 (Whereupon, a brief discussion was
12 held off the record.)

13 - - -

14 MR. GOLDNER: And let me go back on
15 the record for a minute.

16 BY MR. GOLDNER:

17 Q. Just so we're clear what I'm talking about.
18 As of his 60-day evaluation, Mr. Hoffman had had
19 less than five days of casing first class mail on
20 Route 11 and delivering himself; is that correct?

21 A. As of April 3rd?

22 Q. As of April 3rd?

23 A. I think it will be more than that.

24 Q. Okay. We'll go off the record. And can you

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1 Q. Okay. All right. I understand.

2 MR. GOLDNER: I'm going to have this
3 marked for identification. I'm not sure how
4 far I'll go with this. Schoch-9.

5 - - -

6 (Whereupon, Exhibit Schoch-9 was
7 marked for identification.)

8 - - -

9 BY MR. GOLDNER:

10 Q. Can you tell me what Schoch-9 is?

11 A. I believe this is a sheet that the
12 supervisor put together on his training.

13 Q. The supervisor being who?

14 A. I would assume Ken Sands.

15 Q. Is this a record that's kept in the ordinary
16 course and scope of work? Or is this --

17 A. I think this was something that was asked to
18 be put together and that's how it was generated.

19 This is not a normal sheet that we actually do.

20 Q. Okay. All right. And it was Mr. Sands who
21 generated this document?

22 A. I believe so.

23 Q. Do you remember seeing anything similar for
24 Phil Marcantonio or Brian Bonsall?

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1 A. Not that I'm aware.

2 Q. Okay. Thank you. I'm going to show you
3 what we'll mark Schoch-10.

4 - - -

5 (Whereupon, Exhibit Schoch-10 was
6 marked for identification.)

7 - - -

8 BY MR. GOLDNER:

9 Q. I'll ask you, first of all, have you ever
10 seen that document?

11 MS. UYGUR: These two documents are
12 always attached together. So whenever
13 they've looked at their Affidavits, they've
14 also looked at these. You've made them
15 separate exhibits.

16 MR. GOLDNER: Off the record.

17 - - -

18 (Whereupon, a brief discussion was
19 held off the record.)

20 - - -

21 MR. GOLDNER: Back on the record.

22 BY MR. GOLDNER:

23 Q. Mr. Schoch, I'm going to show you, again,
24 Schoch-2 which is your Affidavit. And basically are

Information for Precomplaint Counseling

By (Initials)

AB

Informal No.

Important: Please Read Carefully. This is the only notification that you will receive regarding the necessity for you to complete this form. This should be completed and returned to the EEO Office within 10 calendar days.

On April 30, 1996, you requested an appointment with an EEO Counselor.

A. Requester Information

Name (Last, First, MI)

HUFFMAN, KENNETH L.

Social Security No.

198-38-6019

Home Telephone No.

(610) 296-392Mailing Address
20 WINDING WAY, MALVERN PA 19355

Postal Facility Where You Work

Phoenixville, PA

Position Title

Carrier

Grade Level

05/A

Office Telephone No.

(610) 933-22

Pay Location

Hourly

Tour

Off Days (111 Tour 1, Show Nights Off)

Duty Hours

Part-Time Flex

Employment Status (Check One)

 Applicant Casual TE Career

Time in Current Position

Years

2 3/3 Months

B. Discrimination Factors

In the Postal Service, prohibited discrimination includes actions taken based on your Race, Color, Religion, Sex, Age (40+), National Origin, Physical factors, and/or Mental Disability, or Retaliation (actions based on your participation in prior EEO activity). These categories are referred to on this form.

What Factor(s) of Discrimination Are You Alleging (Be Specific; Describe, i.e., Race-Black, Sex-Female)?

Discrimination based on mental disability (I have a nervous disorder)
Discrimination based on my age (45 yrs).

For Retaliation Allegations Only: If you are alleging retaliation discrimination, provide the date(s) and specifics of the EEO activity which you feel caused you to be retaliated against.

1. On _____, 19_____, I engaged in EEO activity. Case No.: _____

2. On _____, 19_____, I engaged in EEO activity. Case No.: _____

C. Description of Incident/Activity

Please use the space below to briefly describe the incident or activity which prompted you to seek EEO counseling at this time.

On Feb. 16 - April 22, 1996, the following occurred:

I did not have a fair opportunity to perform the requirements of the position to the best of my ability due to the hostile environment harassment and abuse directed at me because of my disability.
The most difficult aspect of the job for ANY postal carrier is to become proficient at casing the mail. The mail casing of route #11 is known as the most complex and difficult to accomplish of all the routes at the Phoenixville, PA Post Office.
During the minimal occasions that I was instructed

EEO COMPLAINTS PROCESSING
LANCASTER DISTRICTContinuation Sheet For Description of Incident

(If Necessary)

by my supervisor to report for casing duty (route # 11) verbal comments of a discriminatory nature were repeatedly made by co-workers in the supervisor's presence. These comments made it extremely difficult, if not impossible, for me to concentrate on the detailed task of casing the mail. The comments were made on every occasion that I was attempting to perform my job. The comments were specifically aimed at me based on my disability. Some of these verbal attacks are as follows: "Koo - Koo, Koo - Koo can't take the stress."

Examples:

(Hostile environment)

Feb. 16, 1996 - 1st day on the job at Phoenixville Location.

Job expectations were explained in a rude and abnoxious manner as though I were entering a prison; "Don't talk to anyone." "You better not do this. . . . " "You better not do "

Joe Bonner and Jeffery Schoch speaking.

Feb. 24, 1996 - Fellow Carrier John Miller said to me in a hushed tone "I heard they're watching you for talking. Be Careful!"

April 2, 1996 - Three days prior to my 60 day evaluation I was finally given the opportunity to complete the entire route (#11) beginning with casing in the early morning and carrying later in the day. I asked my supervisor Ken Sands for help as I fell behind slightly on the casing and was told "You're not going to make it as a carrier!"

EEO COMPLAINTS PROCESSING
LANCASTER DISTRICTContinuation Sheet For Description of Incident(If Necessary)

April 3, 1996 - At my 60 day evaluation one of the 1st statements made to me by Ken Sands was "I've left you alone because of your nervous condition". I was verbally reprimanded for improper replacement of a computerized rod used in evening collections. However, I was never instructed on the proper replacement technique and no supervisor or post master was on duty on the evening (3/1/96) that the supposed offense took place. Only female clerk Amara Thornton and myself were still on duty at the time (after 6:30pm).

April 4, 1996 - Some mis-communication between supervisors K. Sands and K. Cepko created confusion. Although my name was written on the schedule for evening collection and I was told verbally by Sands to do the evening collection, K. Cepko gave me the collection rod and 15 minutes later asked for it back and sent me home, instructing Brian Bonsall to do the evening collection instead.

April 17, 1996 - Another incidence of confusion created by differences of opinion between supervisor. I was told by John Woods that I would do relay, partials and casing during the day. Then told by K. Sands not to do those tasks but to go home at noon and return at 4:30pm.

1. Brian Bonsall and Phil Marcantonio, white males under age 30
(Name of Employee) (Factor(s) describing employee, i.e., Race-Black, Sex-Female)
were treated differently than I when: they were sent for additional training in DPS at Southeastern division location and I was not.

2. _____
(Name of Employee) (Factor(s) describing employee, i.e., Race-Black, Sex-Female)
was treated differently than I when: _____

3. _____
(Name of Employee) (Factor(s) describing employee, i.e., Race-Black, Sex-Female)
was treated differently than I when: _____

D. Officials Responsible for Action

Provide the name(s) of the official(s) who took the action which prompted you to seek counseling at this time.

1a. Name <u>Ken Sands</u>	b. Title <u>Supervisor</u>
c. Office <u>Phoenixville, PA</u>	d. Grade Level
2a. Name	b. Title
c. Office	d. Grade Level

Retaliation Allegations Only: Was/were the official(s) listed in Section D above aware of your prior EEO activity (Explain)? Yes No

E. Resolution Sought

What are you seeking as a resolution to your complaint?

Back pay and benefits since termination and reinstatement to a comparable position.

F. Grievance/MSPB Appeal

On the incident which prompted you to seek EEO counseling, have you:

1. Filed a grievance on the issue? No Yes If yes, _____ (Date) _____ (Step)
2. Filed an MSPB appeal on this issue? No Yes If yes, _____ (Date Filed)
3. Veteran's Preference? No Yes If yes, number of points 10

I feel I was also discriminated against based on my age of 45 years. I did not receive 3 consecutive days of complete route training. Two other employees, men of approximately 23 - 29 yrs of age, hired after me, were given 3 consecutive days of training. I was given the responsibility of training a younger man (\approx 25 yrs old) Brian Bonsall, for 3 consecutive days on the evening collection route and then he was given that duty. Training another employee shows that I had attained a satisfactory performance level. The younger employees received additional training in DPS at the Southeastern division location and I did not.

Re: Kenneth L. Hoffman
Date: 1-22-97

Carrier

Dear Carriers:

I am conducting a discovery request for the EEO Investigation on failure to meet the qualifications and term of my employment at the Phoenixville Post Office.

Will you please provide your input concerning my treatment while on probation.

(1) Have you ever heard any of the following words/statements on the work room floor?

(A) "Cuckoo, cuckoo" YES

(B) "I can't take the stress." YES

YES OR NO
If so, was Management present? YES

YES OR NO

(2) Have you ever seen any male carriers wearing a wig and acting as a female? (Goofing around).

Yes or No

If so, was Management present?

YES OR NO

(3) Are you familiar with Route 11's case? If so, in your opinion is it legible enough for someone who has never cased mail before, to learn on? If not, explain.

Murray Peniston
KH00443
J-2987

4. Was Supervisor Joseph Bonner ever rude or obnoxious to you while on duty?

YES OR NO

5. Would it be safe (for a new P.T.F.'s first day on probationary) to carry marriage mail in a blinding snowstorm?

YES OR NO

Would his time be more well-spent if he would have been practicing caseing. ?

YES OR NO

6. Would it be safe (for a new P.T.F.'s first day on probationary) to sit in a truck and ride with another carrier observing what he was to do in a blinding snowstorm.

YES OR NO

Would his time be better-spent if he would have been practicing caseing? ?

YES OR NO

Your testimony is important to this investigation and your response is appreciated upon receipt of this letter. Please respond within 15 days.

Your cooperation is appreciated.

Kennet L. Hoffman

Kennet L. Hoffman
20 Winding Way
Malvern, PA 19355

Your Signature

MURRAY PERLMAN

Date

1-29-87

KH00444

Case No. 46-175-1060-96
Re: Kenneth L. Hoffman
Date: 1-28-97

FM: WILLIAM GARNER
TO: EEOC

This statement is being submitted in place of the questionnaire that Mr. Hoffman asked me to complete. I will try to be as objective as I can in order to be fair to everyone involved.

I am a full-time letter carrier employed at the Phoenixville, PA post office. I am the alternate shop steward (NALC) as well as one of two official On-The-Job Instructors (OJIs) for the carrier craft. I was directly involved with Mr. Hoffman's training when he first started working at the post office.

I think it is vital to keep in mind that the 90-day probation period is a very stressful time for anyone. The Postal Service can be one of the most confrontational and adversarial places to work in the country (I cite previous GAO reports as well as personal experience). Add to that the fact that a new hire can be fired "for any reason" and you can see how stressful probation can become. The smallest things can have a great impact or become a major distraction for someone trying to learn a new job.

For a person with an emotional disability, an atmosphere like the one described above would be an extremely difficult one to perform in. I find it almost impossible to believe that management was unaware of Mr. Hoffman's disability. Certainly this information would have to be in his personal file. Moreover, because of the nature of his disability, it should have received a high degree of attention by management at all levels. It would be highly irresponsible for this not to have been communicated to the managers in our office. Or, if it was in Mr. Hoffman's file, not to have been read by them.

I have had the opportunity to read over the statements submitted by Mr. Jeff Schoch, Mr. Ken Sands, and Mr. Joe Bonner. It appears that the main reason cited for Mr. Hoffman's dismissal was his inability to case mail properly. I strongly agree that the casing of mail IS a major part of a letter carrier's job, and if someone were unable to meet this requirement they would not be suitable for this craft.

Management has implied that they gave Mr. Hoffman "every opportunity" to learn how to case mail. They discussed this "deficiency" with him during both his 30-day

and 60-day evaluations. Since Mr. Hoffman was having such a hard time learning to case mail, it would have been incumbent upon management to give him more and more office time to help him master this part of his job. Common sense would dictate that if someone is having a problem with one particular task, you give them as much possible time to practice it. That is, if your intention is to keep them past their probation period.

I would urge you to examine very closely the computerized time records of Mr. Hoffman. Compare his office time with his street time--see where he spent more time. Also, check to see if management increased his office time after either of his evaluations, thereby giving him a chance to improve his casing skills. I have not seen these time records and I have no idea what is in them. However, I do believe that therein lie the answers.

There is one other item I believe deserves mentioning. It has to do with where Mr. Hoffman was casing mail. To the best of my recollection, the only case he worked on (with one exception) was route 11. (Again, the time records will indicate if I am correct.) We have all received new case labels since Mr. Hoffman left our office, but at the time he was employed, route 11's case was one of the more difficult to read in our office. In fact, I made mention of this to Mr. Sands at one point. The next day he was moved to another route, but was back at route 11 the following day.

In closing, I would like to reiterate how stressful this job can be. It is stressful for both carriers and supervisors alike. I have even heard the workroom floor referred to as a "war zone" at times. Due to the nature of Mr. Hoffman's disability, I don't know why he would want to endure this type of atmosphere. But that is really NOT the point. What needs to be adjudicated is whether or not he was given the opportunity.



William Garner

Jim CASSANO
Carrier

Re: Kenneth L. Hoffman
Date: 1-22-97

Dear Carriers:

I am conducting a discovery request for the EEO Investigation on failure to meet the qualifications and term of my employment at the Phoenixville Post Office.

Will you please provide your input concerning my treatment while on probation.

(1) Have you ever heard any of the following words/statements on the work room floor?

(A) "Cuckoo, cuckoo"
 (B) "I can't take the stress."

YES OR NO
If so, was Management present?

YES OR NO

(2) Have you ever seen any male carriers wearing a wig and acting as a female? (Goofing around).

~~Yes or No~~
If so, was Management present?

~~YES OR NO~~

(3)

On the first few days of casing, Mr. Hoffman discovered that he was in need of bifocal glasses.

Do you recall him wearing these new glasses?

YES OR NO

C-7

KH00988

4. Was Supervisor Joseph Bonner ever rude or obnoxious to you while on duty?

YES OR NO

5. Would it be safe (for a new P.T.F.'s first day on probationary) to carry marriage mail in a blinding snowstorm?

YES OR NO

Would his time be more well-spent if he would have been practicing caseing.

YES OR NO

6. Would it be safe (for a new P.T.F.'s first day on probationary) to sit in a truck and ride with another carrier observing what he was to do in a blinding snowstorm.

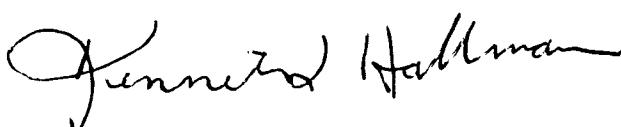
YES OR NO

Would his time be better-spent if he would have been practicing caseing?

YES OR NO

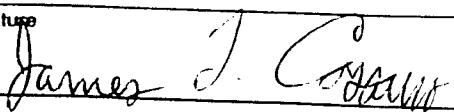
Your testimony is important to this investigation and your response is appreciated upon receipt of this letter. Please respond within 15 days.

Your cooperation is appreciated.



Kenneth L. Hoffman
20 Winding Way
Malvern, PA 19355

Your Signature



Date

1-27-97

KH00989

77

Re: Kenneth L. Hoffman
Date: 1-22-97

Carrier

Dear Carriers:

I am conducting a discovery request for the EEO Investigation on failure to meet the qualifications and term of my employment at the Phoenixville Post Office.

Will you please provide your input concerning my treatment while on probation.

(1) Have you ever heard any of the following words/statements on the work room floor?

(A) "Cuckoo, cuckoo"
(B) "I can't take the stress."

YES OR NO
If so, was Management present?

YES OR NO A YES

B - ?

(2) Have you ever seen any male carriers wearing a wig and acting as a female? (Goofing around).

Yes or No
If so, was Management present?

YES OR NO

(3) Are you familiar with Route 11's case? If so, in your opinion is it legible enough for someone who has never cased mail before, to learn on? If not, explain.

NO I AM NOT FAMILIAR
with that case

4. Was Supervisor Joseph Bonner ever rude or obnoxious to you while on duty?

YES OR NO

5. Would it be safe (for a new P.T.F.'s first day on probationary) to carry marriage mail in a blinding snowstorm?

YES OR NO

Would his time be more well-spent if he would have been practicing caseing.

YES OR NO

6. Would it be safe (for a new P.T.F.'s first day on probationary) to sit in a truck and ride with another carrier observing what he was to do in a blinding snowstorm.

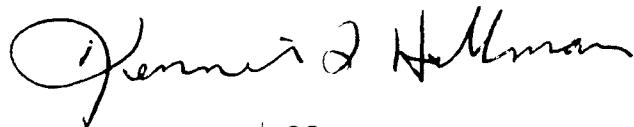
YES OR NO

Would his time be better-spent if he would have been practicing caseing?

YES OR NO

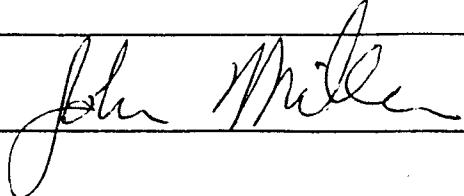
Your testimony is important to this investigation and your response is appreciated upon receipt of this letter. Please respond within 15 days.

Your cooperation is appreciated.



Kennet L. Hoffman
20 Winding Way
Malvern, PA 19355

Your Signature



Date

1-26-97

KH00991

4/4

Don Smith
Carrier

Re: Kenneth L. Hoffman
Date: 1-22-97

Dear Carriers:

I am conducting a discovery request for the EEO Investigation on failure to meet the qualifications and term of my employment at the Phoenixville Post Office.

Will you please provide your input concerning my treatment while on probation.

KEN DID NOT GET A FAIR OPPORTUNITY TO PROVE THAT HE COULD DO THE JOB OF A LETTER CARRIER. HE SEEMED TO BE DOING GOOD ON HIS STREET TIMES BUT DID NOT SEEM TO BE GETTING ENOUGH TIME TO CASE MAIL. CASING MAIL IS THE HARDEST PART FOR A NEW EMPLOYEE ESPECIALLY IF THEY ARE NOT FAMILIAR WITH THE AREA. IT SEEMED MANY HAD MADE A DECISION ABOUT NOT KEEPING KEN RIGHT FROM THE BEGINNING THEY THOUGHT HE WAS TOO OLD. APPROXIMATELY 18 MONTHS AGO ~~THE SAME~~ THE SAME THING WAS DONE TO AN OLDER PERSON ON HIS PREBATION (KOWALSKI, WAS HIS NAME)

(1) Have you ever heard any of the following words/statements on the work room floor?

(A) "Cuckoo, cuckoo"
(B) "I can't take the stress."

YES OR NO
If so, was Management present?

YES OR NO
(2) Have you ever seen any male carriers wearing a wig and acting as a female? (Goofing around).

Yes or No
If so, was Management present?

YES OR NO
(3) Are you familiar with Route 11's case? If so, in your opinion is it legible enough for someone who has never cased mail before, to learn on? If not, explain.

ROUTE 11'S CASE LABELS AT THAT TIME SHOULD HAVE BEEN REPLACED. THEY WERE IN VERY POOR SHAPE. I BELIEVE THEY WERE REPLACED WITHIN THE LAST FEW MONTHS. ROUTE 11'S CASE LABELS AT THE TIME KEN WAS THERE WOULD HAVE BEEN HARD TO LEARN TO CASE A ROUTE 11.

KH00774

4. Was Supervisor Joseph Bonner ever rude or obnoxious to you while on duty?

YES OR NO

JOE BONNER DID NOT TREAT ME THAT WAY BECAUSE OF MY POSITION AS UNION PRESIDENT. HE DID TREAT OTHER PEOPLE THAT WAY.

5. Would it be safe (for a new P.T.F.'s first day on probationary) to carry marriage mail in a blinding snowstorm?

YES OR NO

Would his time be more well-spent if he would have been practicing caseing.

YES OR NO

6. Would it be safe (for a new P.T.F.'s first day on probationary) to sit in a truck and ride with another carrier observing what he was to do in a blinding snowstorm.

YES OR NO

YES OR NO

Would his time be better-spent if he would have been practicing caseing?

YES) OR NO

Your testimony is important to this investigation and your response is appreciated upon receipt of this letter. Please respond within 15 days.

Your cooperation is appreciated.

Kenneth L. Hoffman

Kenneth L. Hoffman
20 Winding Way
Malvern, PA 19355

Your Signature

Donald J. Smith

Date

1/28/97

KH00775

C:\>ETCSCROL A:ETC255P1.RPT

KH01629

C:\>ETCSCROL A:ETC255P1.RPT

On Line 2830 of 4509 Columns 1 to 78 are
 °PL 006 SSN 196-38-6019 Emp KL HOFFMAN FLSA N Sch SSMTWTF °
 ° D/A LDC OPR-LU RSC Lvl Finance Start End Tour(s) Lunch °
 ° Prim: 434 2100 728-00 Q 05 41-6560 0000-0000 050 °
 ° Temp: °
 ° Form 1261 No Ltd Hrs 00 Step A Rte 000 °
 °
 °Processed clock rings °
 °
 ° Saturday °
 ° Base 52:0866 53:0066 °
 °BBR # °
 °06-01 BT 03/30 07.00 728-00 ____ ____ °
 °06-01 MV 03/30 10.52 709-00 011 ____ °
 °06-01 MV 03/30 10.52 727-00 011 ____ 14-30-8578 04/01 03.25 °
 °06-01 MV 03/30 10.52 709-00 ____ ____ 1578 9999 04/01 03.24 PC Deleted Reco °
 °06-01 MV 03/30 15.84 728-00 ____ ____ °
 °06-01 BT 03/30 16.16 ____ ____ ____ ____ ____ ____ / ____ ____ ° OT Not Authoriz °
 °
 °F1 - Help Press <ESC> to exit P - Print °
 °

KH01631

C:\>ETCSCROL A:ETC255P1.RPT
On Line 2847 of 4509 Columns 1 to 78 are:
.

◦ Monday
◦ Base 52:0900 53:0100

◦ EBR #

◦ 06-01 BT 04/01 07.00 728-00 _____.
◦ 06-01 MV 04/01 11.30 727-00 011 _____.
◦ 06-01 MV 04/01 16.18 728-00 _____.
◦ 06-01 PT 04/01 16.50 _____. / _____. OT Not Authoriz

◦ .

◦ Tuesday
◦ Base 52:0836 53:0036

◦ EBR #

◦ 06-01 BT 04/02 07.00 728-00 _____.
◦ 06-01 MV 04/02 10.55 727-00 011 _____.
◦ 06-01 MV 04/02 15.50 728-00 _____.
◦ 06-01 PT 04/02 15.86 _____. / _____. OT Not Authoriz

◦ .

◦ Wednesday

Press <ESC> to exit P - Print
F1 - Help

KH01632

C:\>ETCSCROL A:ETC255P1.RPT

°Unprocessed Clock Rings

°EBR #

°06-01 BT 04/06 07.00 728-00 .- - - - / - - - - BT After YRPPWk°
°06-01 MV 04/06 10.07 727-00 011 .- - - - / - - - - BT After YRPPWk°
°06-01 MV 04/06 14.81 728-00 .- - - - / - - - - BT After YRPPWk°
°06-01 MV 04/06 14.91 727-00 733 .- - - - / - - - - BT After YRPPWk°

TOTALS FOR THE WEEK:

- CD 52 CD 53 CD 54
- áááááááááá áááááááááá áááááááááá
- 45 63 5 63 0 39

°REPORT: ETC255P1

RESTRICTED USPS T&A INFORMATION

DATE: 04/07/96

PHOENIXVILLE PA

TIME: 19:06

ETC EVERYTHING REPORT

PAGE: 70

::\>ETCSCROL A:ETC255P1.RPT

::\>ETCSCROL A:ETC255P1.RPT
On Line 2072 of 4623 Columns 1 to 78 15:45

Base 52:0821 53:0021 54:0021

^EBR #

06-01 BT 03/28 09.50 728-00 _____.
 06-01 MV 03/28 09.58 727-00 006 _____.
 06-01 MV 03/28 15.72 728-00 006 _____.
 06-01 MV 03/28 16.62 731-00 _____.
 06-01 MV 03/28 18.20 728-00 _____.
 06-01 BT 03/28 18.21 _____. / _____. OT Not Authoriz.
 .
 . Friday
 . Base 52:1093 53:0735 43:0093 54:0043
 . EBR #

06-01 BT 03/29 07.00 728-00 _____.
 06-01 MV 03/29 09.76 727-00 006 _____.
 06-01 MV 03/29 16.55 728-00 006 _____.
 06-01 MV 03/29 16.63 731-00 _____.
 06-01 MV 03/29 18.40 728-00 _____.
 06-01 BT 03/29 18.43 _____. / _____. OT Not Authoriz.
 F1 - Help Press <ESC> to exit P - Print

KH01653

C:\>ETCSCROL A:ETC255P1.RPT

KH01655

:\>ETCSCROL A:ETC255P1.RPT

KH01658

C:\>ETCSCROL A:ETC255P1.RPT

• PL 006 SSN 188-62-7963 Emp BA BONSALL FLSA N Sch SSMTWTF
• D/A LDC OPR-LU RSC Lvl Finance Start End Tour(s) Lunch
• Prim: 434 2100 728-00 Q 05 41-6560 0000-0000 050
• Temp:
• Form 1261 No Ltd Hrs 00 Step A Rte 000

°Processed clock rings

- Saturday
- Base 52:0805 53:0005

°EBR # °
°06-01 BT 04/06 07.08 728-00 006 ____.
°06-01 MV 04/06 10.27 727-00 006 ____.
°06-01 MV 04/06 15.31 728-00 006 ____.
°06-01 ET 04/06 15.63 ____-____-____.____-____-____/____-____.____ OT Not Authoriz°

C:\>ETCSCROL A:ETC255P1.RPT

C:\>ETCSCROL A:ETC255P1.RPT

On Line 2059 of 4503 Columns 1 to 78

° Friday

° Base 52:0870 53:0070

° EBR #

°

°

° REPORT: ETC255P1

RESTRICTED USPS T&A INFORMATION

DATE: 04/14/96

° FIN. #: 41-6560

PHOENIXVILLE PA

TIME: 22:42

° YRPPWK: 96-08-2

ETC EVERYTHING REPORT

PAGE: 50

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(Continued On Next Page)

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(Continued From Previous Page)

°

° 06-01 BT 04/12 07.00 728-00 — — .
 ° 06-01 MV 04/12 09.30 733-00 — — .
 ° 06-01 MV 04/12 10.49 728-00 — — .
 ° 06-01 MV 04/12 10.63 727-00 008 — .
 ° 06-01 MV 04/12 16.14 728-00 008 :.

° 06-01 ET 04/12 16.20 — — . / OT Not Authoriz°
 ° F1 - Help Press <ESC> to exit P - Print

° 06-01 ET 04/12 16.20 — — . / OT Not Authoriz°
 ° F1 - Help Press <ESC> to exit P - Print

KH01663

C:\>ETCSCROL A:ETC255P1.RPT

C:\>ETCSCROL A:ETC255P1.RTP

◦ Monday

° Base 52:0894 53:0094 54:0044

°EBR #

°06-01 BT 04/15 09.00 728-00 _____._____.
°06-01 MV 04/15 10.09 733-00 _____._____.
°06-01 MV 04/15 12.36 728-00 _____._____.
°06-01 MV 04/15 12.40 727-00 012 _____._____.
°06-01 MV 04/15 15.22 728-00 012 _____._____.
°06-01 MV 04/15 16.57 731-00 _____._____.
°06-01 MV 04/15 18.41 728-00 _____._____.

06-01 ET 04/15 18:44 - - - / . OT Not Authoriz

o

° Tuesday

° Base 52:0836 53:0036 54:0036

°EBR #

°F1 - Help

Press <ESC> to exit.

P - Primary

KH01666

C:\>ETCSCROL A:ETC255P1.RPT

C:\>ETCSCROL A:ETC255P1.RTP

On Line 2088 of 4637 Columns 1 to 78 ^{Line}
 °06-01 ET 04/15 18.44 _____/_____. OT Not Authoriz

° Tuesday

° Base 52:0836 53:0036 54:0036

° EBR #

°06-01	BT	04/16	09.50	728-00	_____.
°06-01	MV	04/16	10.48	727-00	011 _____.
°06-01	MV	04/16	15.08	728-00	011 _____.
°06-01	MV	04/16	15.55	733-00	_____.
°06-01	MV	04/16	16.22	728-00	_____.
°06-01	MV	04/16	16.75	731-00	_____.

°06-01 MV 04/16 18.26 728-00

°06-01 ET 04/16 18.36 _____/_____. OT Not Authoriz

°

° Wednesday

° Base 52:0815 53:0015

° EBR #

°06-01 BT 04/17 07.00 728-00

Press <ESC> to exit P - Print

° F1 - Help _____

KH01667

:\>ETCSCROL A:ETC255P1.RPT

:\>ETCSCROL A:ETC255P1.RTP

On Line 2135 of 4637 Columns 1 to 78 af
'06-01 ET 04/19 15.50 _____ / _____. OT Not Authoriz

Unprocessed Clock Rings

EBR #

06-01 BT 04/20 07.50 728-00 .- - - - / . BT After YRPPWk²
06-01 MV 04/20 10.07 727-00 009 .- - - - / . BT After YRPPWk²
06-01 MV 04/20 15.23 728-00 009 .- - - - / . BT After YRPPWk²
06-01 ET 04/20 16.02 .- - - - / . BT After YRPPWk²

° TOTALS FOR THE WEEK:

◦ CD 52 CD 53 CD 54
 ◦ áááááááááá áááááááááá áááááááááá
 ◦ 46 .06 6 .06 0 .80

KH01670

C:\>ETCSCROL A:ETC255P1.RTP

C:\>ETCSCROL A:ETC255P1.RTP

° Tuesday

° Base 52:1069 53:0200 43:0069 54:0070

°EBR #

°06-01 BT 04/23 07.51 728-00 .
°06-01 MV 04/23 10.42 727-00 006 .
°06-01 MV 04/23 15.29 728-00 006 .

06-01 ET 04/23 16.01 ____-____-____.____ 8578 9999 04/24 04.42 PC Deleted Rec'd
06-01 ET 04/23 16.01 ____-____-____.____ 8578 8578 04/24 03.53 EBR Deleted Rec'd
06-01 MV 04/23 16.75 731-00 ____-____.____
06-01 MV 04/23 18.47 728-00 ____-____.____
06-01 ET 04/23 18.70 ____-____-____.____ / ____-____.____ OT Not Authoriz

8 *Wadsworth*

Wednesday Page 53 - 0785 E4 - 0045

CEPBD 4

°EBR # °F1 - Help Press <ESC> to exit P - Print

C:\>ETCSCROL A:ETC255P1 RTP

C:\>ETCSCROL A:ETC255P1 RTB

On Line 2102 of 4496

°06-01 MV 04/24 13.75 728-00 — — .
 °06-01 MV 04/24 13.83 731-00 — — .
 °06-01 MV 04/24 15.32 728-00 — — .
 °06-01 MV 04/24 16.82 731-00 — — .
 °06-01 MV 04/24 18.36 728-00 — — .
 °06-01 MV 04/24 18.36 728-00 — — .
 °06-01 ET 04/24 18.45 — — .
 °

° Thursday

° Base 52:0872 53:0072

°EBR #

°06-01 BT 04/25 07.50 728-00 .
°06-01 MV 04/25 10.78 727-00 004 .
°06-01 MV 04/25 11.51 728-00 004 .
°06-01 MV 04/25 16.69 728-00 004 .
°06-01 ET 04/25 16.72 / . . OT Not Authoriz

8

° Friday

^F1 - Help Press <ESC> to exit P - Print

KH01676

\>ETCSCROL A:ETC255P1.RPT

:\>ETCSCROL A:ETC255P1.RPT
On Line 1151 of 4623 Columns 1 to 78

Tuesday

Base 52:0800

EBR #

06-01 BT 03/26 07.00	728-00	—	—
06-01 MV 03/26 09.33	727-00	002	—
06-01 MV 03/26 14.93	728-00	002	—
06-01 ET 03/26 15.50	—	—	—

Wednesday

Base 52:0687

EBR #

06-01 BT 03/27 08.13	728-00	—	—
06-01 MV 03/27 09.67	727-00	002	—
06-01 MV 03/27 14.96	728-00	002	—
06-01 ET 03/27 15.50	—	—	—

Thursday

Press <ESC> to exit P - Print

F1 - Help

KH01692

\>ETCSCROL A:ETC255P1.RPT

PL 006 SSN 175-56-1669 Emp PL MARCANTONIO FLSA N Sch SSMTWTF
D/A LDC OPR-LU RSC Lvl Finance Start End Tour(s) Lunch
Prim: 434 2100 728-00 Q 05 41-6560 0000-0000 050
Temp:
Form 1261 No Ltd Hrs 00 Step A Rte 000

Processed clock rings

› Saturday
› Base 52:0900 53:0100

BDR # 06-01 BT 03/30 07.00 728-00 _____.
06-01 MV 03/30 10.46 727-00 002 _____.
06-01 MV 03/30 16.28 728-00 002 _____.
06-01 BT 03/30 16.50 _____. / _____. OT Not Authoriz.

Press **<ESC>** to exit **P - Print**

KH01695

KH01697

:\>ETCSCROL A:ETC255P1.RPT

• Saturday Base 52:0800

EBR #

P06-01	BT	04/06	07.00	728-00	—	—
P06-01	MV	04/06	09.98	727-00	002	—
P06-01	MV	04/06	15.50	728-00	002	—
P06-01	FT	04/06	15.50	—	—	—

6

◦ Monday Base 52:0842 53:0042

OEPPD +

06-01 BT 04/08 07.00 728-00 06-01
06-01 MV 04/08 10.21 727-00 002 06-01
06-01 MV 04/08 15.74 728-00 002 06-01

..\>ETCSCROL A:ETC255P1.RPT

- Tuesday
- Base 52:0678

QEDR #

06-01	BT	04/09	08.39	728-00	
06-01	MV	04/09	10.35	727-00	002
06-01	MV	04/09	15.52	728-00	002
06-01	ET	04/09	15.67		

8

Wednesday
Page

Base 32:0000

EDR +

°06-01 BT 04/10 07.00 726-00 ____-____-____.
°06-01 MV 04/10 09.87 727-00 002 ____-____.
°06-01 MV 04/10 15.07 728-00 002 ____-____.
°06-01 ET 04/10 15.50 ____-____-____-____.
8

Press **<ESC>** to exit P - Print
°F1 - Help

C:\>ETCSCROL A:ETC255P1.RPT

C:\>ETCSCROL A:ETC255P1.RTP
On Line 1110 of 4637 Columns 1 to 78
PL 006 SSN 175-56-1669 Emp PL MARCANTONIO FLSA N Sch SSMTWTF
D/A LDC OPR-LU RSC Lvl Finance Start End Tour(s) Lunch
Prim: 434 2100 728-00 Q 05 41-6560 0000-0000 050
Temp:
Form 1261 No Ltd Hrs 00 Step A Rte 000
Processed clock rings
Saturday
Base 52:0819 53:0019
EPR #
06-01 BT 04/13 07.00 728-00 _____.
06-01 MV 04/13 10.09 727-00 002 _____.
06-01 MV 04/13 15.68 728-00 002 _____.
06-01 ET 04/13 15.69 _____. / _____. OT Not Authoriz
Monday
Base 52:0810 53:0010
Press <ESC> to exit P - Print
F1 - Help

KH01705

:\>ETCSCROL A:ETC255P1.RPT

:\>ETCSCROL A:ETC255P1.RTP
On Line 1125 of 4637 Columns 1 to 78 400Monday
Base 52:0810 53:0010

EBR #

06-01	BT	04/15	07.00	728-00	—	—
06-01	MV	04/15	10.17	727-00	002	—
06-01	MV	04/15	15.47	728-00	002	—
06-01	ET	04/15	15.60	—	—	—

OT Not Authoriz

Wednesday
Base 52:0801 53:0001

EBR #

06-01	BT	04/17	07.00	728-00	—	—
06-01	MV	04/17	09.67	727-00	002	—
06-01	MV	04/17	14.73	728-00	002	—
06-01	ET	04/17	15.51	—	—	—

OT Not Authoriz

Thursday
Press <ESC> to exit

P - Print

F1 - Help

A - Add

A - Amend

D - Delete

R - Replace

C - Copy

S - Sort

L - List

F - Find

E - Exit

H - Help

M - Main

Q - Quit

X - Exit

Y - Yes

N - No

P - Print

A - Add

M - Amend

D - Delete

R - Replace

C - Copy

S - Sort

L - List

F - Find

E - Exit

H - Help

M - Main

Q - Quit

X - Exit

Y - Yes

N - No

P - Print

A - Add

M - Amend

D - Delete

R - Replace

C - Copy

S - Sort

L - List

F - Find

E - Exit

H - Help

M - Main

Q - Quit

X - Exit

Y - Yes

N - No

P - Print

A - Add

M - Amend

D - Delete

R - Replace

C - Copy

S - Sort

L - List

F - Find

E - Exit

H - Help

M - Main

Q - Quit

X - Exit

Y - Yes

N - No

P - Print

A - Add

M - Amend

D - Delete

R - Replace

C - Copy

S - Sort

L - List

F - Find

E - Exit

H - Help

M - Main

Q - Quit

X - Exit

Y - Yes

N - No

P - Print

A - Add

M - Amend

D - Delete

R - Replace

C - Copy

S - Sort

L - List

F - Find

E - Exit

H - Help

M - Main

Q - Quit

X - Exit

Y - Yes

N - No

P - Print

A - Add

M - Amend

D - Delete

R - Replace

C - Copy

S - Sort

L - List

F - Find

E - Exit

H - Help

M - Main

Q - Quit

X - Exit

Y - Yes

N - No

P - Print

A - Add

M - Amend

D - Delete

R - Replace

C - Copy

S - Sort

L - List

F - Find

E - Exit

H - Help

M - Main

Q - Quit

X - Exit

Y - Yes

N - No

P - Print

A - Add

M - Amend

D - Delete

R - Replace

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S - Sort

L - List

F - Find

E - Exit

H - Help

M - Main

Q - Quit

X - Exit

Y - Yes

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P - Print

A - Add

M - Amend

D - Delete

R - Replace

C - Copy

S - Sort

L - List

F - Find

E - Exit

H - Help

M - Main

Q - Quit

X - Exit

Y - Yes

N - No

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D - Delete

R - Replace

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F - Find

E - Exit

H - Help

M - Main

Q - Quit

X - Exit

Y - Yes

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F - Find

E - Exit

H - Help

M - Main

Q - Quit

X - Exit

Y - Yes

N - No

P - Print

A - Add

M - Amend

D - Delete

R - Replace

C - Copy

S - Sort

L - List

F - Find

E - Exit

H - Help

M - Main

Q - Quit

X - Exit

Y - Yes

N - No

P - Print

A - Add

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D - Delete

R - Replace

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E - Exit

H - Help

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X - Exit

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L - List

F - Find

E - Exit

H - Help

M - Main

Q - Quit

X - Exit

Y - Yes

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S - Sort

L - List

F - Find

E - Exit

H - Help

M - Main

Q - Quit

X - Exit

Y - Yes

N - No

P - Print

A - Add

M - Amend

D - Delete

R - Replace

C - Copy

S - Sort

L - List

F - Find

E - Exit

H - Help

M - Main

Q - Quit

X - Exit

Y - Yes

N - No

P - Print

A - Add

M - Amend

D - Delete

R - Replace

C - Copy

S - Sort

L - List

F - Find

E - Exit

H - Help

M - Main

Q - Quit

X - Exit

Y - Yes

N - No

P - Print

A - Add

M - Amend

D - Delete

R - Replace

C - Copy

S - Sort

L - List

F - Find

E - Exit

H - Help

M - Main

Q - Quit

X - Exit

Y - Yes

N - No

P - Print

A - Add

M - Amend

D - Delete

R - Replace

C - Copy

S - Sort

L - List

F - Find

E - Exit

H - Help

:\>ETCSCROL A:ETC255P1.RTP

:\>ETCSCROL A:ETC255P1.RTP

’ Sunday

Base 52:0150 72:0150

EBR #

06-01 BT 04/21 11.00 728-00

°00-00 DG 04/21 11.00 - 00.50 194-42-6689 04/21 20.89
°06-01 MV 04/21 11.37 733-00 - .
°06-01 MV 04/21 12.42 728-00 - .
°06-01 ET 04/21 12.50 - - .

8

◦ Monday

° Base 52:0836 53:0036

°FBR #

06-01 BT 04/22 07.00 728-00 _____.
06-01 MV 04/22 09.93 727-00 002 _____.
06-01 MV 04/22 15.69 728-00 002 _____.
06-01 ET 04/22 15.86 _____. / _____. OT Not Authori

8

° Tuesday

Press <ESC> to exit P - Pri
°F1 - Help

Analysis of Clock Rings

blue = Dates employee was in compliance with standards

<u>Doc. #</u>	<u>Employee</u>	<u>Date</u>	<u>Begin</u>	<u>Street</u>	<u>End</u>	<u>Route</u>
1629	Hoffman	3/29	7.00	10.18	15.37	11
1631	Hoffman	3/30	7.00	10.52	15.84	11
1632	Hoffman	4/1	7.00	11.30	16.18	11
1632	Hoffman	4/2	7.00	10.55	15.50	11
1635	Hoffman	4/6	7.00	10.07	14.81	11
1642	Hoffman	4/15	7.00	11.26	15.62	11
1642	Hoffman	4/16	7.00	9.93	14.89	2
		7 days				57% success

red = Dates employee was NOT in compliance with standards

<u>Doc. #</u>	<u>Employee</u>	<u>Date</u>	<u>Begin</u>	<u>Street</u>	<u>End</u>	<u>Route</u>
1653	Bonsall	3/29	7.00	9.76	16.55	6
1655	Bonsall	3/30	7.00	10.14	15.84	7
1658	Bonsall	4/5	9.00	10.23	15.94	6
1660	Bonsall	4/6	7.08	10.27	15.31	6
1661	Bonsall	4/9	7.00	11.01	15.98	6
1663	Bonsall	4/12	7.00	10.63	16.14	8
1665	Bonsall	4/13	8.94	10.28	15.05	8
1666	Bonsall	4/15	9.00	12.40	15.22	12
1667	Bonsall	4/16	9.50	10.48	15.08	11
1668	Bonsall	4/17	7.00	10.26	15.64	4
1669	Bonsall	4/19	7.00	9.65	14.72	7
1670	Bonsall	4/20	7.50	10.07	15.23	9
1671	Bonsall	4/20	7.50	10.07	15.23	9
1673	Bonsall	4/23	7.51	10.42	15.29	6
1676	Bonsall	4/25	7.50	10.78	16.69	4
		15 days				47% success

red = Dates employee was NOT in compliance with standards

<u>Doc. #</u>	<u>Employee</u>	<u>Date</u>	<u>Begin</u>	<u>Street</u>	<u>End</u>	<u>Route</u>
1692	Marcantonio	3/26	7.00	9.33	14.93	2
1692	Marcantonio	3/27	8.13	9.67	14.96	2
1693	Marcantonio	3/28	7.00	9.76	15.08	2
1694	Marcantonio	3/29	7.00	10.06	16.37	2
1695	Marcantonio	3/30	7.00	10.46	16.28	2
1696	Marcantonio	4/1	7.00	10.29	16.25	2
1696	Marcantonio	4/2	7.00	11.03	16.44	2
1697	Marcantonio	4/3	7.00	9.94	15.50	2
1699	Marcantonio	4/5	7.00	10.69	16.48	2
1701	Marcantonio	4/6	7.00	9.98	15.50	2
1701	Marcantonio	4/8	7.00	10.21	15.74	2
1702	Marcantonio	4/9	8.39	10.35	15.52	2

1702	Marcantonio	4/10	7.00	9.87	15.07	2
1704	Marcantonio	4/12	7.00	10.07	16.47	2
1705	Marcantonio	4/13	7.00	10.09	15.68	2
1706	Marcantonio	4/15	7.00	10.17	15.47	2
1706	Marcantonio	4/17	7.00	9.67	14.73	2
1707	Marcantonio	4/18	7.00	9.83	16.47	2
1707	Marcantonio	4/19	7.00	9.80	15.12	2
1708	Marcantonio	4/20	7.50	9.81	15.55	2
1710	Marcantonio	4/22	7.00	9.93	15.69	2
1711	Marcantonio	4/22	7.00	9.93	15.69	2
1714	Marcantonio	4/27	7.39	10.54	14.46	2
23 days						43% success

U. S. POSTAL SERVICE
1000 W. VALLEY RD.
SOUTHEASTERN, PA 19399-9401

Kenneth L. Hoffman)	
Complainant)	EEO COMPLAINT NO. 170-97-8104X
)	
v.)	AGENCY CASE NO. 4C-175-1060-96
)	
UNITED STATES POSTAL SERVICE)	JANUARY 14, 1998
Agency)	
)	

CERTIFICATE OF SERVICE

I hereby certify that a copy of the attached Additional Agency Submissions, was sent by certified mail this date to the following:

ADMINISTRATIVE JUDGE

Arthur M. Colby
Administrative Judge
U. S. Equal Employment Opportunity Commission
Philadelphia District Court
The Bourse, Suite 400
21 S. Fifth St.
Philadelphia, PA 19106-2515

COMPLAINANT'S REPRESENTATIVE

Jacqueline M. Vigilante, Esquire
Kessler & Gindin
20th Floor
230 South Broad St.
Philadelphia, PA 19102

M. Kalsky

Miriam Kalsky
H R Associate
U. S. Postal Service
Labor Relations
1000 W. Valley Rd.
Southeastern, PA 19399-9401

DATE *1/14/98*

KENNETH HOFFMAN								
DATE	ASSIGN-MENT	BEGIN TOUR	LEAVE STREET	RETURN OFFICE	END TOUR	TOTAL OFFICE	TOTAL STREET	TOTAL HOURS
13-Feb	TRNG	700	1200	1250	1,550.00	800	0	800
14-Feb	TRNG	700	1300	1350	1,550.00	800	0	800
15-Feb	TRNG	700	1200	1250	1,550.00	800	0	800
16-Feb	TRNG	800	1200	1250	1,850.00	1000	0	1000
17-Feb	TR-09/PHX	800	1100	1150	1,550.00	700	0	700
20-Feb	TR-09/PHX	994	1100	1150	1,675.00	631	0	631
	TR-COLL	1675	1675	1800	1,840.00	40	125	165
21-Feb	TR-MVC	845	900	925	825.00	55	25	80
	TR-11	925	982	1697	1,706.00	68	665	731
	COLL	1706	1706	1851	1,860.00	9	145	154
22-Feb	11/**222	850	922	1835	1,864.00	301	863	864
23-Feb	COLL	1650	1650	1874	1,875.00	1	224	225
24-Feb	TR-09/PHX	700	1100	1150	1,551.00	801	0	801
26-Feb	11/**246	700	946	1603	1,619.00	262	607	869
27-Feb	COLL	1650	1716	1865	1,865.00	68	149	215
28-Feb	COLL	1650	1672	1841	1,850.00	31	169	200
Feb-29	CR-11/312	1000	1012	1854	1,654.00	12	592	604
	COLL	1654	1679	1850	1,850.00	25	171	196
1-Mar	CR-11/319	1000	1019	1844	1,844.00	19	575	594
	COLL	1644	1844	1842	1,852.00	10	198	208
2-Mar	11/**360	1000	1060	1602	1,648.00	106	492	598
4-Mar	11/**317	1000	1017	1599	1,681.00	99	532	531
	COLL	1681	1681	1838	1,836.00	0	155	155
5-Mar	11/**344	1000	1044	1670	1,665.00	39	576	615
	COLL	1670	1670	1832	1,832.00	0	162	162
6-Mar	11/**307	1000	1007	1471	1,865.00	201	414	615
	COLL	1665	1665	1830	1,831.00	1	165	166
7-Mar	11/**312	1000	1012	1565	1,666.00	113	503	616
	COLL	1666	1666	1838	1,840.00	2	172	174
8-Mar	11/**311	1000	1011	1624	1,675.00	62	563	625
	COLL	1675	1675	1830	1,830.00	0	155	155
9-Mar	11/**324	1000	1024	1457	1,457.00	24	433	457
11-Mar	11/**334	1000	1034	1529	1,666.00	171	445	616
	COLL	1686	1836	1838	1,836.00	170	0	170
12-Mar	COLL	1850	1675	1830	1,830.00	25	155	180
13-Mar	CS-11	1250	1250	1250	1,600.00	350	0	350
14-Mar	11/**334	1000	1034	1550	1,675.00	159	466	625
	COLL	1675	1675	1825	1,830.00	5	150	155
15-Mar	11/**320	815	1020	1685	1,685.00	205	615	820
	COLL	1685	1685	1832	1,832.00	0	147	147
18-Mar	11/**309	1000	1009	1446	1,550.00	113	387	600
18-Mar	11/**309	1000	1009	1624	1,678.00	61	585	626
	COLL	1676	1676	1832	1,832.00	0	156	156
19-Mar	11/**316	1000	1016	1678	1,678.00	16	612	628
	COLL	1678	1678	1836	1,836.00	0	158	158
20-Mar	CS-11	1400	1628	1678	1,678.00	228	0	228
	COLL	1678	1678	1833	1,833.00	0	155	155
22-Mar	11/**321	1000	1021	1661	1,661.00	21	590	611

	COLL	1661	1661	1842	1,842.00	0	181	181
23-Mar	11/**339	950	1039	1540	1,550.00	99	451	550
25-Mar	CS/**TRNG	700	986	986	986.00	286	0	286
	COLL	1504	1684	1841	1,841.00	180	157	337
26-Mar	11/**307	1000	1007	1558	1,677.00	128	499	827
	COLL	1677	1677	1844	1,844.00	0	167	167
27-Mar	11/**300	984	1000	1464	1835	377	414	791
28-Mar	11/**307	1000	1007	1443	1551	115	386	501
29-Mar	11/**318	700	1018	1537	1550	331	489	800
30-Mar	11/**352	700	1052	1584	1816	384	482	886
1-Apr	11/**200	700	1130	1818	1850	452	438	900
2-Apr	11/**200	700	1055	1550	1586	391	445	836
3-Apr	11/**355	1000	1055	1678	1678	55	573	628
	COLL	1678	1678	1837	1839	2	159	181
4-Apr	11/**321	1000	1021	1517	1800	104	448	550
5-Apr	11/**320	1000	1020	1570	1592	42	500	542
6-Apr	11/**307	700	1007	1481	1808	434	424	858
8-Apr	11/**310	1000	1010	1484	1871	197	424	821
	COLL	1671	1671	1817	1817	0	146	146
9-Apr	11/**309	955	1009	1474	1671	251	415	666
	COLL	1671	1671	1834	1835	1	163	184
10-Apr	11/**311	1000	1011	1416	1430	25	355	380
11-Apr	11/**313	1000	1013	1497	1867	183	434	617
	COLL	1867	1867	1847	1848	1	180	181
12-Apr	11/**308	1000	1008	1511	1672	169	453	822
	COLL	1672	1672	1842	1842	0	170	170
13-Apr	11/**304	1000	1004	1418	1600	188	362	550
15-Apr	11/**100	700	1000	1550	1550	300	500	800
16-Apr	TR-02	700	1000	1500	1550	350	450	800
17-Apr	11/**330	1000	1008	1470	1800	138	412	550
18-Apr	11/**308	1000	1008	1499	1875	184	441	825
	COLL	1675	1675	1842	1842	0	167	167
19-Apr	CR-11	1000	1187	1470	1470	187	233	420
	COLL	1470	1470	1647	1647	0	177	177
21-Apr	11/**300	1000	1131	1131	1131	131	0	131
	COLL	1131	1131	1557	1600	43	376	419
22-Apr	CS	1100	1300	1300	1300	200	0	200
				TOTAL	14538	25280	39818	



PHIL MARCANTONIO								
DATE	ASSIGN-MENT	BEGIN TOUR	LEAVE STREET	RETURN OFFICE	END TOUR	TOTAL OFFICE	TOTAL STREET	TOTAL HOURS
20-Feb	TR	800	1450	1450	1450	800	0	800
21-Feb	TR	800	912	1618	1,618	112	656	768
22-Feb	TR	800	1200	1250	1,600	750	0	750
23-Feb	TR	1100	1100	1500	1,500	0	350	350
26-Feb	TR	700	900	900	900	200	0	200
27-Feb	NS					0		
28-Feb	TR	700	1200	1250	1,550	800	0	800
2-29-97	TR	700	1200	1250	1,550	800	0	800
1-Mar	7-TR	700	1200	1250	1,550	800	0	800
2-Mar	TR-09	700	950	1500	1,550	300	500	800
4-Mar	TR-09	700	950	1500	1,550	300	500	800
5-Mar	RT-2**350	1000	1050	1550	1,600	100	450	550
6-Mar	RT-2**308	950	1008	1515	1,575	118	457	575
7-Mar	RT-2**305	950	1005	1510	1,575	120	455	575
8-Mar	RT-2**369	950	1069	1675	1,675	119	556	675
	COLL	1675	1675	1844	1,844	0	169	169
9-Mar	RT-2**309	950	1009	1600	1,625	84	541	625
Mar-97	RT-2**315	1000	1015	1675	1,800	40	510	550
						0		
12-Mar	NS							
13-Mar	RT-2**CR	1130	1130	1700	1,725	25	520	545
14-Mar	RT-2**355	950	1055	1800	1,825	130	495	625
15-Mar	RT-2**274	950	974	1487	1,504	41	463	504
16-Mar	RT-2**288	950	986	1487	1,550	79	471	550
18-Mar	RT-2**309	1000	1009	1676	1,878	9	617	628
	COLL	1678	1678	1832	1,832	0	158	158
19-Mar	RT-2**263	950	983	1482	1,550	81	489	550
20-Mar	RT-2**271	950	971	1495	1,550	76	474	550
21-Mar	RT-2**309	1000	1009	1508	1,800	101	449	550
22-Mar	RT-2**362	950	1082	1726	1,749	135	614	749
23-Mar	RT-2**303	950	1003	1511	1,550	92	458	550
25-Mar	RT-2**311	1000	1011	1250	1,250	11	189	200
	TRNG	1250	1250	1559	1,559	0	259	259
	RT-6	1559	1559	1692	1,701	8	133	142
26-Mar	RT-2	700	933	1493	1,550	290	510	800
27-Mar	RT-2	813	867	1498	1,550	208	479	687
28-Mar	RT-2	700	976	1508	1,551	319	482	801
29-Mar	RT-2	700	1006	1637	1,650	319	581	900
30-Mar	RT-2	700	1046	1828	1,850	368	532	900
1-Apr	RT-2	700	1029	1825	1,851	355	546	901
2-Apr	RT-2	700	1103	1844	1,860	419	491	910
3-Apr	RT-2	700	894	1550	1,550	294	508	800
4-Apr	RT-2**272	950	972	1532	1,583	73	510	583
	COLL	1583	1656	1832	1,841	82	176	258
5-Apr	RT-2	700	1069	1648	1,869	380	529	919
6-Apr	RT-2	700	998	1550	1,550	298	502	800
8-Apr	RT-2	700	1021	1574	1,592	339	503	842
9-Apr	RT-2	839	1035	1552	1,567	211	467	678
10-Apr	RT-2	700	987	1507	1,550	330	470	800

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11-Apr	RT-2	769	982	1545	1,551	219	513	732
12-Apr	RT-2	700	1007	1647	1,877	337	590	927
13-Apr	RT-2	700	1009	1568	1,569	310	509	819
15-Apr	RT-2	700	1017	1547	1,560	330	480	810
16-Apr	NS				0			
17-Apr	RT-2	700	967	1473	1,551	345	456	801
18-Apr	RT-2	700	983	1647	1,660	298	614	910
19-Apr	RT-2	700	980	1512	1550	318	482	800
20-Apr	RT-2	750	981	1555	1600	278	524	800
21-Apr	TR-CS	1100	1250	1250	1250	150	0	150
22-Apr	RT-2	750	981	1555	1600	276	524	800
23-Apr	RT-2**349	1000	1049	1567	1675	157	468	625
24-Apr	RT-2	750	969	1548	1601	274	527	801
25-Apr	AUX.12	1400	1403	1507	1632	128	54	182
26-Apr	RT-2**298	950	998	1626	1678	100	578	678
	COLL	1678	1678	1864	1867			0
27-Apr	RT-2	739	1054	1446	1458	327	342	669
				TOTAL	13570	24856	38426	

BRAIN BONSALL								
DATE	ASSIGN-MENT	BEGIN TOUR	LEAVE STREET	RETURN OFFICE	END TOUR	TOTAL OFFICE	TOTAL STREET	TOTAL HOURS
18-Mar	TR-COLL	1675	1675	1842	1874	32	167	199
19-Mar	TR-09	700	999	1561	1,601	339	512	851
20-Mar	TR-07	800	935	1450	1,589	174	485	639
21-Mar	TR-07	700	915	1487	1,552	270	532	802
22-Mar	TR-09	1000	1081	1487	1,551	155	346	501
23-Mar	06***328	950	1028	1645	1,664	97	587	684
25-Mar	FIRM TR	1000	1044	1287	1,287	44	193	237
		6	1287	1400	1,400	0	113	113
	COLL-TR	1400	1400	1738	1,739	3	286	289
26-Mar	06***305	1000	1005	1553	1,664	116	498	614
	COLL-TR	1684	1877	1844	1,844	13	187	180
27-Mar	06***306	1000	1006	1516	1,558	48	510	558
	COLL	1655	1659	1835	1,835	4	176	180
28-Mar	06***258	950	958	1572	1,862	98	584	662
	COLL	1682	1682	1820	1,821	1	158	159
29-Mar		6	700	976	1855	1,863	284	629
	COLL	1683	1683	1840	1,843	3	177	180
Mar-98		71	700	1014	1584	1,611	341	520
1-Apr	COLL	1400	1401	1493	1,665	173	92	265
	COLL	1865	1865	1823	1,823	0	158	158
2-Apr	COLL	1200	1303	1370	1,883	396	17	413
	COLL	1663	1663	1810	1,810	0	147	147
3-Apr	CS-04	701	978	978	988	287	0	287
	REL	988	993	1096	1,096	8	100	108
	11***300	1096	1096	1866	1,668	0	520	520
4-Apr	0***251	951	1037	1512	1,561	235	425	860
	COLL	1661	1661	1832	1,841	9	171	180
5-Apr	06***323	900	1023	1694	1,666	195	521	718
	COLL	1666	1666	1813	1,827	14	147	161
6-Apr		6	708	1027	1531	1,563	351	454
	8-Apr	INS				0	0	0
8-Apr		6	700	1101	1598	1,656	459	447
10-Apr	RELAYS	950	984	1080	1,080	14	118	130
	22/SECTION	1080	1116	1457	1,618	197	291	488
	COLL	1618	1837	1838	1,845	28	201	227
11-Apr		9	550	968	1809	1,558	487	491
12-Apr	B&RELAYS	700	930	1049	1,063	244	119	363
		8	1063	1063	1814	1,620	6	501
13-Apr	B&RELAYS	884	972	1016	1,028	90	44	134
		8	1028	1028	1505	1,550	45	427
15-Apr	12/RELAYS	900	1009	1236	1,240	113	227	340
		12	1240	1240	1522	1,657	135	232
	COLL	1657	1657	1841	1,841	0	184	184
16-Apr	11***	950	1048	1508	1,555	145	410	555
	COLL	1555	1675	1828	1,836	130	151	281
17-Apr		4	700	1026	1584	1,565	327	488
18-Apr	REL/08	1000	1033	1112	1,121	42	79	121
		6	1121	1121	1824	1,705	81	453

19-Apr	7	700	965	1472	1,550	343	457	800
20-Apr	8	750	1007	1523	1,602	336	466	802
22-Apr	RELAYS	1000	1065	1118	1,118	65	53	118
	8	1118	1118	1580	1,637	57	482	519
	COLL	1637	1637	1831	1,831	0	144	144
23-Apr	6	751	1042	1529	1,601	363	437	800
	COLL	1675	1675	1847	1,870	23	172	195
				TOTAL	7366	18384	23750	